

11th April 2006

The General Manager,
Digital Broadcasting and Spectrum Management,
Department of Communications,
Information Technology and the Arts,
GPO Box 2154, CANBERRA ACT 2601.

Re: Response to discussion paper on Digital TV reforms

Dear Sir/Madam

I wish to make the following submissions in response to the Government's discussion paper on Digital Broadcasting reform:

1. I object to no new free-to-air broadcasting licenses being granted when the current moratorium expires in December 2006. Australia has had three commercial TV networks for the past 40 odd years and the need for new competition in the industry is well overdue. The government should proceed with the analogue shutdown in 2008 as originally planned in order to free up the VHF channels currently being wasted. These channels could then be auctioned off to the highest bidder with the proviso that they be used for full service digital broadcasting only (no analogue simulcasting). The current infestation of boring reality TV shows across the three existing networks, can only be combated by providing viewers with greater choice of channels. A fourth, and even a fifth commercial network would provide this. As well as giving advertisers more choice and greater cost competition than they currently have.

2. The current 20 hours per week of High Definition content is insufficient. In order to encourage consumers to acquire HD equipment, there needs to be more HD content available. The government should increase the minimum quota from 20 to 40 hours per week for ALL broadcasters including the ABC and SBS. (On the subject of SBS, it doesn't appear to be complying with the original digital broadcasting standard, in that it's using MPEG audio on it's HD channel when it should be using Dolby AC3.) There also needs to be a tightening up of what HD actually is. At the moment only channels 9 and 10 use the 1080i proper HD format, while the other channels are using the 576p format which really isn't high definition at all. It's merely standard definition with progressive scanning. The government should impose a minimum HD standard of 720p, with 1080i and 1080p being optional.

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3. I live in a UHF broadcasting black-hole. Templestowe has lots of hills and I live on the wrong side of one of them. My SBS and Channel 31 reception isn't very good in analogue. And my SBS digital reception is an all or nothing affair. It's plagued with dropouts and picture freezing most of the time, making it virtually unwatchable. A translator service with the transmission tower on top of one of Melbourne CBD buildings might help...but it's an expensive option and may not solve the problem. Allowing SBS and Channel 31 to relocate to the two currently unused VHF channels that were earmarked for datacasting would be a cheaper and more effective solution. I would like the government to facilitate this prior to the 2008 analogue shutdown.

4. The lack of penetration of digital set-top boxes into low income households could be dealt with by getting Centrelink to provide them free to those who want them. With the cost of SD boxes falling, in some cases to as little as \$50 each, the cost to government would not be prohibitive. And it would ensure that low income Australians would not be left without access to free to air television after the analogue broadcasts cease.

5. If the government really wants people to switch to digital TV quickly then why not ban the watermarking of digital TV channels? And only allow it on the analogue channels until they're shut down. I, for one, hate watermarking and a lot of people I know feel the same way. We know what channel we're on and there's no need for the constant reminder. Some watermarks aren't that subtle either. Many people would gladly switch to digital to get away from the things.

I hope my comments are helpful and that they are acted upon. The opinions of free to air television viewers really need to be given more weight in the debate than is currently the case.

Sincerely



Keiron Whibley