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5 September 2007

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

Dear Sir/Madam,

**Reference: Submission on Digital Conversion of Self-Help Television Retransmission Sites**

Please find attached a copy of Council's submission to your June 2007 Discussion Paper on the above issue. Though delayed, we request that you give full consideration to our response.

In summary we strongly consider:-

- 1) A single Digital Video Broadcasting transmitter is preferred for each service, rather than the use of multiplexers and the conversion should be fully funded by the Federal Government in a manner that minimises the ongoing operation and maintenance of each site.
- 2) Direct-to-Home option for small remote communities is **not** preferred and the conversion by the Federal Government of the existing self-help retransmission sites from analogue to digital is the preferred approach.
- 3) The timing of digital conversion should be completed in a manner that ensures even remote customers enjoy quality broadcasting at all times and that a minimum 2 year transition period is given for the conversion to occur.

The Federal Government must ensure there is no cost shifting to Local Government through this process. Already the existing sites are costing up to \$20,000 p.a. each to operate, maintain and replace aging equipment.

Your consideration of our submission is much appreciated and should you have any further queries, please contact Michael Brady, Executive Manager, Infrastructure and Commercial Services on (07) 4982 8323.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Bryan Ottone".

**Bryan Ottone**  
Chief Executive Officer



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Ref: DVB-T.DCITA

Date: 26/07/2007

**Response to the Discussion Paper entitled**  
**Digital Conversion of Self-help Television Retransmission Sites**

issued by

Federal Government's  
Department of Communications, Information Technology and the Arts.  
June 2007

The issues that the department is asking for feedback on are:-

**(1) Whether the use of individual digital transmitters for each service or the use of multiplexers, would be the most effective option for converting existing analogue self help retransmission sites to digital in relation to:**

- **Technical viability;**
- **Cost of conversion, operation and maintenance; and**
- **Any other options for the digital conversion of self-help television retransmission sites.**

Technical viability

The most effective solution given that responsibility for the operation and on going maintenance for the delivery of television from the black spot sites lies entirely with the Local Government - is to supply one DVB-T transmitter for each service.

This allows for the following:-

- (a) Any increase in the number of transmission channels from the program provider is accommodated without having to add additional transmitters or having to select at site what channels are transmitted. This has an impact as to the technical ability of the maintainer.
- (b) In the event of a faulty transmitter, only the services provided by the single program provider are affected rather than multiple program providers being affected. Example loss of Imparja transmitter – only the channels from Imparja are affected.
- (c) Level of technical expertise to maintain the site is lower as fault situations can be corrected by module swap out rather than ability to adjust and operate multiplexers.

(d) Reduced single points of failure to all services by minimal use of common equipment. By not having multiplexers in the program feeds to the transmitters there is one less single piece of equipment that when fails impacts on multiple services.

Cost of conversion, operation and maintenance

Cost of providing a DVB-T transmitter for each service provider together with associated infrastructure is more effective and cheaper than the cost of conversion with multiplexing which would provide an initial lower cost but would result in the Federal Government having to continue funding long term to cover the growth in equipment requirements as additional service channels are added. This would prove more expensive as operational infrastructure like combiners would also have to be upgraded or replaced as the additional transmitters are added.

Cost of operation and maintenance is less with dedicated DVB-T transmitters as service personnel do not have to attend site to continually select channel sources as would occur on a multiplex system.

Simplified program feeds with minimal adjustment to the DVB-T services results in a lesser degree of expertise required to operate and maintain the sites. This translates directly to lower costs as technical services are heavily limited in rural and remote Australia.

**(2) Whether the DTH (Direct-to-Home) option for viewers residing in remote areas of Australia where the population is less than 500 should be adopted, rather than converting existing self-help retransmission sites from analogue to digital.**

The provision of television and radio in remote areas from the existing Blackspot sites has built on the high reliance that remote communities have in their Local Government. Unlike metropolitan areas there is a much closer relationship between remote communities and their local government especially for provision of services that take on a higher priority than those in metropolitan areas.

A once off provision of DTH satellite equipment by the federal government would place local government under an expectation by the local community to maintain this service as it has done up until now with the Blackspot sites.

The movement of people into and out of the areas concerned would further complicate the issue with requests for additional supply well past the initial conversion, this would place demands on local government and require the federal government to continue supply of DTH equipment for years.

Any faults with the equipment would immediately place an expectation on local government to carry out repairs as we have done until now with the free to air radio and TV services.

Local Government does not have the resources and technical expertise in remote areas to service customers homes and this would place additional financial costs on Local Government.

Present viewers that utilize the services of existing PAY TV operators wait days for rectification of faults, due to the proximity of technical support, a situation that remote communities would not tolerate for free to air services that they believe has already been funded by the tax payer.

**(3) View regarding the timing of digital conversion of self-help retransmission sites.**

Areas where the Blackspot sites provide services other than the ABC, and the ABC service has already gone to digital should be provided with funding to enable those Blackspot sites to move into digital conversion. This would alleviate the present enquiries that Local Governments receive from viewers that have DVB-T receivers but have to keep changing back to analogue to watch the other services. Delaying funding to the Blackspot sites in these situations only prolongs the transition period and discourages the viewers from going digital.

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