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TO : MIKE MARKOWITZ DATE : 16 JULY 1993 PAGES : 2

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Videosport (Pty) Limited, Reg. No. 82/05088/07, 2706, Parklands 2121, South Africa. 4 Jameson Avenue, Melrose Estate 2196, Johannesburg, South Africa. 27 (011) 788-5138/9. Fax: (011) 880-2170.

VIDEOSPORT

ELEVISION

Directors: A.A.B. Abraham, P.M. Abraham.

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THE CHAIRMAN, THE TECHNICAL COMMITTEE ON THE INDEPENDENT MEDIA COMMISSION AND THE INDEPENDENT TELECOMMUNICATIONS AUTHORITY, MULTI-PARTY NEGOTIATION PROCESS, WORLD TRADE CENTRE, KEMPTON PARK.

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16 JULY 1993

Dear Sir,

RE: ALLOCATION OF MICROWAVE FREQUENCIES FOR TV

We are in receipt of the fourth working draft of the Independent Broadcasting Authority Bill.

We are aware that the deadline for the making of submissions has passed, but we would be grateful if you would consider this submission as we only obtained a copy of the Bill yesterday.

As major producers of television productions for broadcast and an applicant for a broadcasting licence we wish to place the following views regarding signal distribution on record:

- The Independent Broadcasting Authority only should control all microwave frequencies in Southern Africa.
- A minimum of six additional microwave frequencies, over and above those already allocated to the SABC, M-Net and Bop TV, should be made available to independent producers, facility houses and broadcasters like The Camera Store, Telemedia, Magus Vision and ourselves.

Yours faithfully,

ahan ARTHUR ABRAHAM

cc: Mike Markovitz - Media and Broadcasting Consultants Wend Wendland - Webber Wentzel

ref: IBAMICRO.B07

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TELEMEDIA (PTY.) LTD.

Tel. (011) 803-3353/4 Fax (011) 803-2534 Telex 4-29993 SA P.O. Box 783515 Sandton, 2146 Republic of South Africa

Your Ref.: Our Ref.: PFB/mjc/B1898 Date: 15 July 1993

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Fax No 397-2281

Technical Committee on the Independent Media Commission and Independent Telecommunications Authority

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Dear Sirs

Our company is engaged in the supply, installation and service of radio and television broadcasting equipment and, in particular, the provision of microwave links, repeaters and transmitters for radio and television broadcasting. Our principal customers are, of course, the South African Broadcasting Corporation, M-Net and various governments of cur surrounding countries since they are the people who invariably have license to operate such equipment.

We have recently found an increasing need in the private sector for the provision of point-to-point microwave link facilities for video events such as board meetings, educational conferences and race meetings. We have been approached by several companies requesting that we make available on a hire basis such microwave link facilities to provide a teleconferencing service between two points. Unfortunately, we are unable to provide such a service since we do not have a licensed frequency on which to operate microwave equipment. Moreover, such point-to-point microwave links still appear to be considered by Telkom SA as being a broadcast facility and are limited to the two companies, namely M-Net and SABC, who have broadcast licences and, therefore, control an unfair monopoly.

We have corresponded with Telkom in 1982 and 1983 concerning our interest in providing the local television industry with portable microwave link hire facilities and our subsequent correspondence, up to and including, our letters in 1988 and 1989. On each of these occasions Telkom has indicated that the type of service we intend to operate is being considered tantamount to a broadcasting service and this coupled with the shortage of suitable frequencies has prevented them to accede to our request. We must stress once again that it is not our intention to broadcast, neither is it our intention to compete with broadcasters in any way. It is simply that we are a commercial company and can see a requirement for such a service provided favourable consideration can be given towards licensing it. UL-1993 11:17 FROM TELEMEDIA PTY LTD

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TELEMEDIA

We currently hire out, operate and maintain portable microwave links on an exclusive contract to M-Net and this contract, unfortunately, forbids us to use equipment or their frequencies for anything other than M-Net productions. Our current stock of microwave transmission equipment which is used for M-Net and extensively throughout Bophuthatswana to feed the horse racing TAB's consist of some 28 links which are currently underutilised. Telemedia has high rise office accommodation in Durban, Cape Town, Pretoria and Johannesburg ideally suited and strategically chosen for repeater sites for mobile links for business conferencing and direct news injection to the broadcasters. It is our ultimate aim to interconnect these premises by means of wideband lines, either at 34 Mbit digital level or analogue wideband bearers suitable for direct injection of video with audio subcarriers.

With regard to the privatisation of radio and broadcasting in general, it is Telemedia's aim to be able to offer an outside broadcast link service to any and all of the proposed broadcasters, including M-Net and SABC.

It is for this reason that we are formally requesting:

- a. Two or three SHF frequencies suitable for portable <u>microwave</u> <u>link equipment</u>. (Ideally in the band 15 GHz or in the band 2,3 - 2,7 GHz or 3,3 - 3,7 GHz or 5,5 - 6,0 GHz or ever 12,5 - 15 GHz.)
- b. Formal permission to book and pay directly to Telkom for the use of protection bearers throughout the country for regional contribution for broadcasters or video conferences.
- c. Two wideband radio link frequencies suitable for radio broadcasting <u>links</u> with the 15 KHz bandwidth. i.e. Two frequencies in the 240-260 MHz or 850-950 MHz band with 200 KHz of RF bandwidth.

As you are no doubt aware, the frequency band between 2,300-2,500 MHz was allocated some time ago to SABC for MMDS transmission. We have supplied the first MMDS transmitters for experimental service to SABC and M-Net and we would, of course, be most anxious to secure one or two of these frequencies for our own use for multipoint distribution of video conferencing or private point to multi-point transmission. We see a market in the areas of live horse racing fed to the betting shops (TAB's) and church broadcasts, where one host church is the originator of sound and vision and several satellite churches have the service displayed on large screen video projectors.

Our concern is that the SABC still appear to be monopolising their right to the use of all transmission frequencies to the detriment of private industry.

TELEMEDIA

Telemedia would, of course, be very interested in the possibility of being able to install MMDS type transmitters in the principal centres for the relaying of such private microwave feeds without the additional cost and "red tape" associated with operating through the SABC, or Sentech (Pty) Ltd, as they now call themselves.

This represents the twenty third application for television microwave link frequencies that we have made to Telkom department since 1982.

Our business is in the provision of technical facilities for broadcasters and major corporate clients requiring television link facilities from one boardroom to another.

We enclose several testimonials from prospective clients, including SABC, M-Net and Telkom, in the hope that this will add credibility to our requirement.

We look forward to your favourable response.

Yours faithfully What the tester

PETER F BRETHERICK Director

c.c. Mr Mike Markovitz : Fax No 333-3437

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