JUL 12 '30 WE CHPM WEDDER WEINIZEL PEDIN

## Attorneys Notaries & Conveyancers Patent Attorneys & Trade Mark Agents

## Webber Wentzel

PER TELEFAX: 397-2211

The Technical Committee on the Independent Media Commission and independent Telecommunications Authority **World Trade Centre** 

60 Main Street Johanneaburg PO Box 61771 Marshalltown 2107 South Africa Telephone (011) 832 2836 . Telex 4-85230 SA Wang Telecom (011) 836 7097 Teletax (011) 894 6701/832 1623/4 Docex No 26

Offices et: Sendton City Sendton and in Europe

in association with Shepstone & Wylie and Findley & Talt

Our reference

Mr W B Wendland 109/T.3/93

12 July 1993

Dear Sirs

SUBMISSION OF TRINITY BROADCASTING NETWORK ON THE FOURTH WORKING DRAFT OF THE INDEPENDENT BROADCASTING AUTHORITY BILL

Attached please find the submission of Trinity Broadcasting Network regarding the Independent Broadcasting Authority Bill.

Copies of the submission are also being forwarded to each member of the Technical Committee.

WENTZEL

MICS/WSW/FX/T3



## SUBMISSION OF TRINITY BROADCASTING NETWORK ON THE FOURTH WORKING DRAFT OF THE INDEPENDENT BROADCASTING AUTHORITY BILL

- 1. Trinity Broadcasting Network ("Trinity") is a television broadcasting service, operating, at present, from Bisho, Ciskel and Umtata, Transkel, and offering mainly religious programming.
- 2. Trinity is a member of the National Association of Broadcasters of South and Southern Africa ("the NAB"). The NAB is filing its own submission with regard to the Independent Broadcasting Authority Bill ("the Bill"). Trinity accords fully with the NAB submission, but, in addition, wishes to file its own submission with regard to one particular aspect of the Bill.
- 3. More particularly, Trinity wishes to comment on section 33(2) of the Bill.
- 4. Section 33(2) of the Bill provides for the "grandfathering" of Sentech, the signal distribution company of the South African Broadcasting Corporation.
- 5. As will appear more fully below, Trinity is also a signal distributor, and believes that all signal distributors should be deemed to have been licensed under the provisions of section 33(2) of the Bill.
- 6. As stated above, Trinity is, in addition to being a broadcaster, also a signal distributor. Trinity's signal distribution is via microwave. Trinity has one television signal transmitter in the Ciskei, and four such transmitters in the Transkei, there being two at Umtata, and one each at Butterworth and Mount Ayliff. Plans for the erection of a further four transmitters have been approved, at Engcobo, Mount Fletcher, Port St Johns and Cala, all of which are in the Transkei. A further transmitter is also planned for Mount Shepstone, also in the Transkei.



7. Accordingly, Trinity believes that not only Sentech should be provided for in section 33(2) of the Bill, but that Trinity, and all other signal distributors, should also be entitled to benefit from the provisions of the section.

FOR TRINITY BROADCASTING NETWORK

12 JULY 1993