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As Ian has demonstrated with his very comprehensive presentation analogue switchover is a major task.

In the UK which begins its switchover process next year, there is still a great deal of confusion and uncertainty among viewers and broadcasters. Just last week the Guardian described digital switchover as "one of the biggest civil projects in history, it has been compared in importance to the conversion to North Sea gas in the sixties and decimalisation a decade later".

The former chief executive of Channel Five, David Elstein, says the complexities and uncertainties were such that the switch had "the makings of a fiasco beside which the Dome will be relegated to the status of a footnote in the petty cash column".

In the United States which has set a switchover date for 2009 a recent survey by the National Association of Broadcasters found that 62% of those surveyed had "seen, read or heard nothing" about the digital transition and only 4% were able to identify 2009 as the date for switchover.

What these two stories highlight is the magnitude of the physical task and scope of the communication and education campaign that will be needed to drive the task.

Free TV supports the development of a Digital Action Plan. We think switchover needs to be comprehensively planned and carefully managed to ensure that the transition is as smooth as possible for Australian viewers, and they do not lose access to free-to-air services.

If that is the starting point and the main concern throughout the process we should be able to ensure that the task is completed with minimum disruption just as we have been able to ensure that the digital roll out has caused minimum disruption to viewers.

It's clear that Australians are switching on to digital in ever growing numbers and that the range of products in the market place is giving Australian viewers a range of price points at which they can buy in. Everything from top of the range integrated television sets to cheap set top boxes

Free TV has submitted to the government that we support a staged process to achieve switch-off, similar to the process being followed in the UK; first, involving planning for switch-off and second, implementation of switchover.

We think switchover must be planned on a licence area by licence area basis to ensure that it is managed smoothly, cost effectively and disruption to viewers is minimised.

Switchover should be tested in one or more test markets, followed by switchover in less populated and discrete markets, progressing to metropolitan, regional overlap areas and the most heavily populated metropolitan areas last.

The timetable needs to be informed by the impact on viewers. It is crucial that viewers do not lose access to free-to-air services.

Wikipedia in its entry on digital switchover makes the point that the “facility with which digital switchover can be achieved depends not only on the size of the area and number of transmitters to be converted, but also on the number of viewers who rely on the analogue signal as their primary or only means of TV reception”

As many of you know, reliance on free-to-air services as the primary means of television reception in Australia is amongst the highest in the world.

In most other markets, including the UK, US and Germany many households receive free-to-air television services via cable or satellite. As such, switchover in other countries has a much smaller potential impact on the overall population than in Australia.

It is also worth noting that ambitious switchover timetables set in other countries have been driven by heavy government subsidies and other regulatory incentives. For example, in the UK the BBC licence fee is substantially underwriting switchover, and incentives have included licence fee reductions for commercial broadcasters. In the US, \$US1.5 billion has been allocated to subsidise consumer acquisition of set top boxes and a further \$US5 million has been allocated for a consumer education campaign. In Italy, there have been generous subsidies on the price of set top boxes and Germany has directly subsidised broadcasters.

The Government, the Department and broadcasters need to work together to formulate a plan and timetable for managing the switchover process. A great deal has already been learned through digital roll-out which was coordinated by the Department, ACMA and broadcasters. A similar approach should be taken to switch-off.

We think that when Digital Australia is set up within the Department the industry advisory group should play a key role in addressing the key policy issues with major input from broadcasters.

The Group should be supported by Working Parties with appropriate expertise from a range of stakeholder bodies on technical and marketing (consumer education) issues.

One of the early tasks of the Group must be to undertake a comprehensive review of current take-up data, to identify gaps and to make recommendations regarding further research needed to give an accurate representation of take-up.

In the UK total digital take-up figures include both free-to-air digital and pay digital households. In Australia it is not yet appropriate to combine free and pay households as not all free-to-air television services are transmitted on the pay television platform.

Take-up rates must also take into account the existence of two or more analogue televisions and additional receivers in many households. Many of these devices also need to be converted to digital if consumers are not to be unnecessarily deprived of access to free television services, and the same viewing options they currently enjoy in their homes.

One of the key tasks that will need to be undertaken as part of the Digital Action Plan is a full assessment of the coverage of current digital terrestrial services in order to identify any areas that may not receive equivalent coverage of analogue and digital signals. Again we are concerned that all Australians who currently receive analogue signals must be able to receive free-to-air digital services after switchover. From what we know already it is highly likely that further spectrum will be required to address coverage gaps as they are identified.

The Digital Action Plan Group will need to consider a range of measures to enhance the transition to digital. These include clear labelling of consumer equipment, measures to address reception difficulties in multi-dwelling units and the investigation of digital black spot solutions. Said quickly like that the task sounds very manageable. But as we know in dealing with analogue black spots these matters are highly sensitive politically and can be very difficult to solve.

The issues around multi-unit dwellings for instance may in fact require the Council of Australian Governments (COAG) to bring together all levels of government to ensure for instance that all new high rise buildings are able to receive digital signals.

Then there are the problems for consumers who buy a new digital receiver only to discover that their antenna needs replacing. And of course there are also the problems that will need to be addressed in relation to schools, hospitals, nursing homes and other public facilities that will need to make the switch.

Any one of these tasks on its own is a challenge, solving them all at once is going to require significant commitment from all players.

Finally, I'd just like to make a few comments about the communication and education campaign that will be required to drive the physical tasks.

Not everyone has a teenager in the house who can intuit how television sets, computers and set top boxes operate and fix them with their eyes seemingly shut. For many older people the technology itself is a hurdle. And for some members of our community cost is definitely a factor.

These people often rely heavily on free to air television for their entertainment at home. They must not be forgotten or overlooked.

It is vitally important that genuinely disadvantaged households do not lose their free television services after switch-off. Government should consider subsidies for vulnerable groups closer to the switchover date and with the benefit of research to understand the depth of the conversion barrier and those groups most likely to be affected.