



COMMUNITY
BROADCASTING
ASSOCIATION OF
AUSTRALIA

Review of the Viewer Access Satellite Television (VAST) service

Submission by the Community Broadcasting Association of
Australia to the Department of Communications and the Arts

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1. Introduction

- 1.1. The Community Broadcasting Association of Australia (CBAA) welcomes the opportunity to submit comments in relation to the review being undertaken by the Department of Communications and the Arts (the Department) of the Viewer Access Satellite Television (VAST) service.
- 1.2. The CBAA is the peak body for community broadcasting in Australia. Community broadcasting is a vital and growing part of the media landscape. The 2016 National Listener Survey¹ reported the highest listening levels for community radio on record - 5.3 million Australians tuned in to over 450 not-for-profit community-owned and operated radio services operating across the country each week. This is up from approximately 3.8 million in 2004.
- 1.3. Community radio broadcasting provides a diverse mix of cultural and specialist talks and programming through community access including educational, music, Indigenous, print handicapped, youth, seniors, religious and ethnic language and multicultural services. It broadcasts a high level of local content and information and, in regional areas especially, provides a valuable mechanism for discussion of local issues and community participation and contributes to active social networks.

2. Aurora Digital and the VAST platform

- 2.1. The consultation and discussion paper has a focus on direct-to-home (DTH) satellite television services.
- 2.2. The CBAA fully supports and endorses the on-going utility of the VAST platform for provision of these services on a free-to-air basis, noting that addresses the important public policy outcome of ensuring a full and proper mix of free-to-air broadcast services (television) is available to *all* Australians.
- 2.3. In addition, the VAST platform is a valuable, cost effective, highly reliable and fit-for-purpose platform for distribution of community broadcasting related radio content, then able to be received on a free-to-air basis.
- 2.4. VAST is part of the Aurora digital platform and makes use of commodity priced DTH satellite reception equipment. The platform was introduced using leading edge technology for both modulation and encoding: DVB-S2 and MPEG4.
- 2.5. MPEG4 encoding is next generation compared to the MPEG2 encoding that was then, and still is, in wide-spread use for terrestrial digital television. VAST also uses best of breed AAC audio encoding, including its high efficiency variants.
- 2.6. The platform is therefore useful as a low cost means to distribute broadcast content, including audio, to readily available low cost reception equipment.
- 2.7. The one-to-many nature of DTH satellite is immune to the number of concurrent users, and so can scale to very large numbers of users with no cost or technology impact.
- 2.8. The choice of satellite orbital slot and technology results in ubiquitous coverage across Australia, enabling reliable reception with small dish sizing and low cost reception equipment.
- 2.9. The platform has been successfully used for distribution of community broadcasting content and services since inception, taking over from the previous Aurora platform.
- 2.10. The community sector has studios, transmission facilities and listeners in locations across Australia. Content and services specifically distributed include full time radio feeds for print handicapped services, Indigenous services, religious services as well as omnibus delivery of content addressing a diverse mix of cultural and specialist talks programming.

¹ Community Broadcasting Association of Australia (2017). Community Radio National Listener Survey
- Summary report of findings January 2017
<https://www.cbaa.org.au/broadcasters/get-data-national-listener-survey-station-census>

3. Media landscape

- 3.1. The increased availability of online content has relevance in those locations in Australia where high speed broadband is available.
- 3.2. However, the current users of the VAST are unlikely to be in locations where high speed broadband is available.
- 3.3. Even in areas where it may be available, online solutions introduce an operational cost to end users. While that may be acceptable to some users, in the absence of VAST, this does set up a discrepancy compared to users served by free-to-air terrestrial services.
- 3.4. There is no obvious alternate solution that can provide ubiquitous coverage and no operational cost impost. Neither mobile nor the NBN can economically provide ubiquitous coverage, especially in regional and remote areas, nor sustain broadcast scale usage patterns. Without Government legislative intervention, neither mobile nor NBN can provide services at no operational cost to users.
- 3.5. The CBAA fully supports and endorses the on-going utility of the VAST platform for provision of such service on a free-to-air basis in a way that ensures the important public policy outcome of ensuring a full and proper mix of free-to-air television and broadcast services is available to all Australians.
- 3.6. To address public policy objectives, the CBAA also advocates the Government introduce legislation to mandate the availability to the public of zero-rating (ie, no data cost to the user) for a defined mix of licensed broadcast services, television and radio.

4. Technology and distribution

- 4.1. Given the widely dispersed and numerous areas of low population density, especially in regional and remote Australia, the CBAA reiterates support for the on-going utility of the VAST platform as the safety net solution to ensure public policy objective of a full and proper mix of free-to-air television and broadcast services being available to all Australians.
- 4.2. The CBAA also reiterates a complementary strategy would be legislation to mandate the availability to the public of zero-rating (ie, no data cost to the user) for a defined mix of licensed broadcast services, television and radio.
- 4.3. In terms of specific improvements and new technology in relation to VAST, there seems good reason to continue use of the current orbital slot and DVB-S2 modulation.
- 4.4. A change in either of those aspects is likely to be highly disruptive, and unlikely to deliver material improvements in service efficiency: the current systems are already highly efficient.
- 4.5. A change in these aspects would likely necessitate adjustment and/or change-out of the external plant, with significant attendant site-by-site costs and for no real gain.
- 4.6. By contrast, a staged introduction of next generation encoding systems does seem worthwhile.
- 4.7. Use of High Efficiency Video Coding (HEVC) can sit alongside the existing MPEG4 encoded content, with that content ensuring continuity for users with existing set top boxes, and, as and when users change to the late model low cost set top boxes (no change to the external plant required) they would then also receive extra services, and/or services with high(er) definition, courtesy of HEVC.

5. Conditional access

- 5.1. The nature of the satellite coverage and the VAST platform results in availability of free-to-air content and services across all of Australia.
- 5.2. The Conditional Access system that has been overlaid on the platform uses smart card identification to restrict access to commercial free-to-air television broadcasters to those users approved by the respective commercial free-to-air television broadcasters.
- 5.3. If access is denied to a specific viewer, there is a complaints process via the ACMA.
- 5.4. There are no restrictions on access to the VAST services of the ABC or SBS.
- 5.5. The discussion paper notes that the conditional access arrangements are designed to preserve the integrity of the Licence Area framework of regional and metropolitan commercial free-to-air commercial television services.
- 5.6. The discussion paper also notes that this Licence Area framework does not protect from content that is delivered online. Broadband access has given viewers access to television (and other) content both domestically and from around the world.
- 5.7. Nowadays, the use of the Conditional Access system to limit access to services seems overly complex and to run counter to public policy objectives, especially where VAST capacity is funded by Government for safety net purposes to ensure availability of services to the public.
- 5.8. If there are material negative impacts to commercial service being available out of area, or in areas of terrestrial signal deficiency, then it seems reasonable that these could be addressed through direct provision by the affected broadcaster of local free-to-air transmission facilities or by provision of further and/or compelling local content.

6. Funding

- 6.1. The discussion paper notes that VAST is supported by funding from the Government, which ensures that a range of services is provided by both the national and commercial broadcasters.
- 6.2. The special arrangements for VAST funding are implemented as a safety net for viewers in areas where other options, such as terrestrial free-to-air reception, are difficult or expensive for the broadcasters to provide directly.
- 6.3. That requirement is on-going, and the CBAA fully supports that there be on-going funding to support the free-to-air availability of television and broadcast services to all Australians.

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