

**DRAFT COMMUNITY BROADCASTING
SUPPORT SCHEME FINAL POLICY PAPER**

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1. LIST OF ACRONYMS

BDM: Broadcasting Digital Migration

CBSP: Community Broadcasting Support Programme

CODESA: Convention for a Democratic South Africa

DOC: Department of Communications

DTT: Digital Terrestrial Television

ECA: Electronic Communications Act

ICASA: Independent Communications Authority of South Africa

MDDA: Media Development & Diversity Agency

NDP: National Development Plan

NGP: New Growth Path

PAJA: Public Administrative Justice Act

RDP: Reconstruction and Development Programme

SAMRO: South African Music Rights Organisations

SOEs: State Owned Enterprises

STL: Studio Transmission Links

USAF: Universal Access Fund

USAASA: Universal Service & Access Agency of South Africa

IBA: Independent Broadcasting Authority

GCIS: Government Communications and Information Systems

PLL: GCIS Provincial and Local Liaison Office

2. TABLE OF DEFINITIONS

1. **Community** means community as defined in the broadcasting Act (no.4 of 1999)
2. **Community Broadcasting service** means a service as defined in the Broadcasting Act (no.4 of 1999)
3. **Minister** means the Minister responsible for Communications
4. **Non -Prescribed Assistance** means support requested and implemented by the projects /beneficiaries
5. **Prescribed Assistance** means support facilitated and implemented by the CBSP to the projects /beneficiaries
6. **Regulator** means the Independent Communications Authority of South Africa
7. **Support Scheme** means the community broadcasting support scheme

3. ACKNOWLEDGMENTS

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Lastly, special thanks must be given to the Minister's Office in the Department of Communication for this final policy document, namely MDDA, Sentech and ICASA, without whom this research would not have been possible.

4. EXECUTIVE SUMMARY

The Department received submissions made in response to the invitation by Minister of Communications for public comments on the Draft Community Broadcasting Support Scheme (hereafter referred to as “the scheme”) under Broadcasting Act, 1999 (Act No. 4 of 1999) and the Electronic Communications Act, 2005 (Act No.38 of 2005) respectively.

The present Policy Paper presents recommendations gathered throughout the period of consultations directed to various stakeholders, these being policy-makers, research institutions and private sectors that have interests to the development of Community Broadcasting Sector. The Draft Community Broadcasting Support Scheme document exposed the rise and challenges faced by Community Broadcasting Sector while underlining the need for public policy at all levels of support to be developed in an integrated way. The Draft document justifies this recommendation underlining the added value an integrated approach to the Sector’s support would bring to its developments and sustainability, how it could be a way to better reflect and accompany the interdependency of sector, hence ensuring a more effective integration between economic growth and sustainability.

Subsequently, the draft community broadcasting support scheme draft paper highlights the importance of analysing and monitoring community broadcasting activities, the whole range of Sectors specific support needs, their challenges as well as their society cumulative impacts more thoroughly. Indeed, in combining with a number of licensed stations and unavailability of broadcast frequency poses a considerable threat to the health of already-stressed Sector’s sustainability, an element that is addressed by the Digital Migration and needs further consideration.

The Draft Community Broadcasting Support scheme addresses in the last part of the document the need to identify the projects to be funded with the reason to enhance the sustainability of the Sector. An effective support programme needs to clearly identify what types of support will be given. In lieu of rapid technological developments evidenced by the convergence of new technologies, it is of utmost importance that the new policy framework addresses critical questions relating to the nature of the projects to be funded and new support areas should be considered, particularly if those projects have potential to promote and enhance media access by the communities and diversity as intended in the Broadcasting Act of 1999.

The submissions have highlighted the need to transfer the implementation part of the Community Broadcasting projects to the Government entities and for the Department to focus

on the policy making that will identify the developmental needs and sustainability of the Sector, therefore.

5. INTRODUCTION

The support for the community radio sector was initiated in 1998 as part of an effort by the government to build the fledgling community radio sector as a new phenomenon in the new democratic dispensation. Although the support was limited to infrastructural assistance, for community radio in the beginning, it later grew to include content production, signal distribution subsidies and capacity-building. The growing number of Community TV initiatives sprouting in the various parts of the country presents community TV as an inevitable reality. Therefore, it can no longer be ignored, both in terms of policy planning and future support. On its own, government has committed to rollout at least one community radio in every district municipality and 1 community TV per province.

The above scenario, therefore, motivated for the comprehensive review of the support programme in an attempt to meet this increasing demand, thus strengthening and sustain community broadcasting for convergence and the multichannel digital environment.

On the 1st July 2015, the Department published the Community Broadcasting Support Scheme, inviting the interested people and stakeholders to submit comment and inputs. During the course of the consultation, the Department held discussions, interviews and workshops with Community Broadcasting Forums, Community Broadcasters, community groups and NGOs interested in facilitating community growth.

This document captures the issues, problems and future challenges identified by stakeholders in responses to the published Draft Community Broadcasting Support Scheme. A range of options and questions were put forward to address these for public input. These are based on approaches suggested through the consultation process and in research conducted by the Department of Communications. Stakeholders were invited to make submissions on which approach they believe will best achieve the objectives above. At times, no specific policy options were proposed. In these instances, targeted questions were asked.

6. PROBLEM/ THEORY OF CHANGE

Despite the growth of the support over the years, it had its own limitations as it is: not informed by a comprehensive policy, implemented on a blanket approach without looking at individual

stations' uniqueness and needs, limited to community radio to the exclusion of community TV, narrow in scope and not often linked to other government programmes around job creation and industry development, not subjected to regular reviews for improvement.

In addition to the above issues, there is increasing demand for community broadcasting services in the communities. The growing number of Community TV initiatives sprouting in the various parts of the country presents community TV as an inevitable reality. Therefore, it can no longer be ignored, both in terms of policy planning and future support

With the increasing demand for the support amid declining public funds, clarity has to be provided regarding the objective, nature and criteria for the support as well as clear value proposition for public funding. It is on these basis that the support is being reviewed so as to set out a clear framework for providing support to community broadcasting in South Africa.

The Department reviewed the programme to align it with the entire community broadcasting value chain. This will ensure that both community sound and television services are provided for in the strategy. Importantly, the Department observes the development of the community television sector, and its potential to unlock the local content industry, creation of jobs and contribution to economic development. The new community broadcasting strategy will clarify the government's support framework of the community broadcasting sector.

7. DISCUSSION

The support programme over the years has largely been non-financial covering broadcasting infrastructure, signal distribution subsidy, programme production and capacity building. As the support programme gets revised, a number of questions remain pertinent:

- What new support areas should be considered?
- Will the new support include direct financial assistance?
- Since this support subsumes community broadcasting, will it be replicated to the community TV as well?

In responding to these questions, the **proposals** are made in respect of the following:

- The nature of support, which includes projects to be funded (both radio and TV,
- Source of Funding,
- Management of support,
- Access to support, including criteria for eligibility and assessment,
- Policy expectations in exchange of support

7.1. THE OBJECTIVES OF THE SCHEME

The community broadcasting support scheme sets out a framework for providing support to community broadcasting in South Africa, both radio and TV with the primary objectives to sustain community broadcasting services in the republic for the rapidly converging digital broadcasting environment; attract investment, including strategic infrastructure investment in community broadcasting sector, strengthen the community broadcasting sector to contribute to support the local content industry so as to create jobs; promote community broadcasting sector as a strategic vehicle to advance socio-economic goals relating to access to information, media diversity, empowerment and youth development; Improve governance and stability in the community broadcasting sector.

The majority of Stakeholders' submissions appropriately concur with the objectives of the Community Broadcasting Support Scheme. However, it came from the submissions that the Sector needs the Government to acknowledge the representative of the Community broadcasting and as such it should make a deliberate attempt to strengthen, operationally embrace and support the forums.

The scheme should enable long term sustainability of the community broadcasting sector which should ideally reduce reliance on government support by the sector. It is within the responsibility of government through IGR to facilitate the expansion of community broadcasting services, to provide greater access to rural communities. The Department of Communications should formulate an enabling policy for both radio and television broadcasting services.

Government Proposed Policy Position:

The position of the Department on the objective of this policy is to sustain community broadcasting services in the republic for the rapidly converging digital broadcasting environment; attract investment, including strategic infrastructure investment in community broadcasting sector, strengthen the community broadcasting sector to contribute to support the local content industry so as to create jobs; promote community broadcasting sector as a strategic vehicle to advance socio-economic goals relating to access to information, media diversity, empowerment and youth development; Improve governance and stability in the community broadcasting sector.

7.1.1. EXPECTED RESULTS FROM IMPLEMENTED CBSS'S OBJECTIVES

Community Broadcasting programs and services will provide communities with convenient access to relevant, reliable, comprehensive and timely information. Government resources provided to the Sector will be managed as valuable assets to support the outcomes of programs and services, as well as operational needs and accountabilities. Governance structures, mechanisms and resources are in place to ensure the continuous and effective management of the community broadcasters.

7.2. NATURE OF SUPPORT: THE FUTURE

7.2.1. THE NATURE AND SCOPE OF SUPPORT

An effective support programme needs to clearly identify what types of support will be given. In lieu of rapid technological developments evidenced by the convergence of new technologies, it is of utmost importance that the new policy framework addresses critical questions relating to the nature of the projects to be funded and new support areas should be considered, particularly if those projects have the potential to promote and enhance media access by the communities and diversity as intended in the *Broadcasting Act of 1999*.

While stakeholders and stations involved in the market research identified several challenges in implementation of individual programmes, all those interviewed endorsed the areas of support chosen by the DOC (equipment roll-out, signal distribution subsidies, programming and the development of a satellite network to link the stations and allow for sharing of content). It was further repeatedly emphasized that the project had provided invaluable support to the sector. Participants in the research generally agreed that the focus areas continued to be relevant, though it was suggested that the objectives of supporting each area should be clearly stated and captured in a Manual or Handbook.

Based on these comments from stakeholders and lessons from an implementation perspective, the support seems to be strategically streamlined to serve the sector adequately. Though minor adjustment can be made to the various support areas detailed hereunder, the four areas of support should be maintained.

The support covers broadly *prescribed* and *non-prescribed assistance*. While prescribed assistance covers support facilitated and implemented by the CBSP to projects, non-prescribed assistance covers those areas requested and implemented by the projects/beneficiaries.

While consultation presented a powerful opportunity for governments to address key issues across sectors, submissions informed the Department of Communications that Community Television should not be funded directly but subsidised signal distribution costs, work on policy alignment and interdepartmental cooperation to ensure that this support is unlocked. It is therefore, important for the mandate of community TV to remain unchanged.

As a substitute of setting up a new structure within the Department of Communications to manage support for community broadcasting, the department should allocate a budget which will be managed and disbursed by the MDDA. Proper legal binding accountability measures to be put in place. According to the submissions received from stakeholders Infrastructure support must apply to self-providing and AM community radio stations.

It is within the needs of sector that Community Broadcasting Support Scheme should cater for training, transfer of installation expertise and technical support for stations provided with equipment. The Department of Communications must examine the establishment and funding of research and development activities focused on new media opportunities.

Amongst other important things it came out from the submissions that the Research and Development could be the inclusion of the growing municipal Wi-Fi public access networks, which are already providing avenues for free access to audio/video content.

Government Proposed Policy Position:

The position on the Department on the scope of support is to transfer the community broadcasting support to entities, by allocating equipment roll-out budget which will be managed and disbursed by the MDDA; programme production to be managed by NEMISA/iNESI; and Signal distribution subsidy budget will also be migrated to Sentech for easy and equal distribution of funds.

7.2.2. PROJECT TO BE FUNDED

Notwithstanding the advances made by new media in the area of broadcasting, there is no evidence to suggest that it is ready to fiercely compete with conventional broadcast methods in the short term in South Africa. Although Broadband plans usher hopes of providing opportunities, this will take long before such platforms can make a meaningful contribution in the way that traditional platforms have. In view of limited funding availability, this support is

not in a position to provide assistance to stand-alone internet broadcasting services or platforms. Therefore, the scheme will continue to fund traditional radio and television projects. The nature of support to be dispensed and the application process are different as outlined in the forthcoming sections.

The outcome of the investigations conducted for this project by Sol Plaatje Institute 'community TV Business Model' and PYGMA Consulting 'Investigating the Impact of community broadcasting support' has confirmed that the Department hold particular promise to improve service delivery in South Africa through community broadcasting and target group has been identified with sufficient clarity, to whom the impact intervention can be delivered and for whom the impact of that intervention can be measured.

The different models of Community Television such as Local Metropolitan, Sub-regional, Provincial and National community of interest of public access channels should be considered for funding.

Government Proposed Policy Position:

The Department will support community broadcasting services projects as defined by the Broadcasting Act 4 of 1999 (s1). Provincial Community TV Model will be considered with a focus of funding all community stations within the particular province and District Municipalities, through the MDDA.

7.2.3. FUNDING OF COMMUNITY BROADCASTING SECTOR

The policy have been informed by the evidence-based interventions which have been seen to be effective in mitigating the challenges face by the Community Broadcasting Sector Internationally. The sector conducted the benchmarking exercise to determine which of their processes and procedures could benefit the most from improvement, and in which areas these improvements might yield results. The Department believes that the Sector's benchmarking on a consistent and ongoing basis, companies can gauge how effective their improvement efforts are over time.

Internationally, local authorities are entitled to levy a local charge to support the community broadcasting service and are compelled to do so. Proposals for a national public funding mechanism it has been a key policy demand of the sector in the past and have gained recent momentum during the consultation of the scheme. The Sector feels that there is a very uneven pattern of public funding for the sector as other community project do receive funding from the

municipalities. The weak economic base of the sector is because of not receiving local authority support and has a direct impact on programme quality and institutional stability.

The survival of Community broadcasting is difficult because most often operate on small budgets, receiving a fraction of the support which the Government provides through MDDA and operating largely as a result of support from the communities they service.

Through the submissions the sector emphasised the need to place an obligation to municipal authorities to fund costs of maintaining the local broadcaster that are not met from other sources.

In response to the dedicated media office in parliament, stakeholders emphasize the need to establishing the Parliamentary budget to ensure that important Parliamentary events are broadcast live and, dedicated media office in Parliamentary to ensure programme syndication. Public funding mechanisms should be put on place for the production of public service programming.

There is a strong attribution for the Department of Communications to intervene and include the SAMRO fees on support programme considering that community radio are not businesses. The Department of Communications was tasked with the responsibility to engage SAMRO on administrative issues and modalities of submitting cue sheets by radio stations.

The Department of Communications to take a responsibility of spreading community broadcasting funds across agencies to ensure independence of community broadcasters from government. More creative funding model must be developed and it should take cognisance of potential income streams such as selling airtime to government and others, training and skills development by stations, and grant makers. It is imperative that a mixed and realistic set of funding models be adopted.

The Department to provide funds, and the MDDA should administer disbursements. Community broadcasters should be limited to 20% of their revenue from advertising and that 80% of their revenue came from the sale of time slots to companies/ organisations that serve the local community. The ratio of television and radio funding be reviewed after 3 years rather than 5 years, as appeared on the Policy discussion document.

Non-Governmental Organisations should be encouraged to consider funding of community broadcast particularly content production, capacity building and governance matters. The

intergovernmental relations is essential through the involvement of both provincial government and or municipalities for provision of building to house the community broadcaster. The hiring and renting of private facilities is too expensive and can result in an unintended unforeseen consequences, therefore Municipality to take that responsibility.

South African Revenue Service should grant 18 (a) tax status to community broadcasters to ensure the release of corporate funding on the basis of corresponding tax breaks.

Government Proposed Policy Position:

The Department of Communications to focus on the Policy Development and the Community Support Programme related to equipment and infrastructure roll-out to be transferred to MDDA as supported by the Submissions to the CBSS published document.

The Department to take a responsibility in encouraging other Government Departments, entities and Non-governmental Organisations (NGO) to support Community Broadcasting.

In terms of the Municipality Systems Act 2000, all municipalities (i.e. metropolitan, district and local) have to undertake an IDP process to produce IDP's. As the IDP is a legislative requirement it has a legal status and it supersedes all other plans that guide development at local government level. Integrated development planning as a vital tool for planning and development. The IDP is the principal strategic planning instrument which guides and informs all planning, budgeting, management and decision-making processes in a municipality. Therefore, the Department feels that the Community Broadcasters should be included into the IDP's for the period of 5 years (duration of IDP review) for providing support towards venue or premise for which the stations will broadcast from.

Programme production subsidy should be migrated to NEMISA/iNESI

Signal distribution subsidy budget should be migrated to Sentech for easy and equal distribution of funds

7.3. LOCAL CONTENT AND PROGRAMMING

The Broadcasting Act, Act 4 of 1999, as amended, section 2 (b) – (h), provides for content related objects including strengthening cultural fabric of South Africa as well encouraging plurality of views; investment and capacity building the sector; development of local content programming; and catering for the programming needs of all South Africans including those of children, women, the youth and the disabled.

The Electronic Communications Act, Act 36 of 2005 Section 61 (1) provides for ICASA to prescribe regulations “regarding the commissioning of independently produced South African programming”. Section 61 (5) of the Act makes provision for ICASA to prescribe conditions requiring a radio licensee to broadcast a specified minimum percentage of South African music. Section 61 (5) also provides for ICASA to differentiate between the categories of broadcasting licenses, define the viewing and listening times, where applicable, indicate the various categories of television programmes and the period within which the broadcasting service licensee must comply.

The legislative framework establishes an Independent Communications Authority of South Africa (ICASA) to regulate broadcasting, telecommunication and postal in the public interest. The regulator acts within the parameters of the policy and law, prescribes regulations to implement mechanisms for enforcing local content regulations, impose measurable license terms and conditions, monitor compliance to the license conditions and manage frequency spectrum.

Local content **attract** audiences and therefore generates revenue from advertising and sponsorships, and as such has become a commercial imperative. Challenges in the sector require relevant government departments to develop mechanisms to improve the industry.

Community broadcasting has a critical role to play in contributing towards the promotion, preservation and development of the South African Music industry. It within the submissions to the published Community Broadcasting Scheme that the emphasise was made by the stakeholders that the content reports generated should be available ICASA, SAMRO and any other advertiser including but not limited to the GCIS, for purpose of content verification. A robust independent content monitoring program should be conducted independently of community broadcasters and it should be based on tried and tested technologies.

It is within the interest of promoting the local languages that it needs defined to include more than the official languages of the particular province and/ or local municipality where the station

concerned services is distributed within the geographic community. Department of Communications should continuously ensure that the content and programming is available across a wide range of platforms and devices. Communities must have the means to distribute their own content across these platforms.

Government Proposed Policy Position:

The Community broadcaster's charter and Codes of Good practice must provide for mechanisms community participation for programming format that supports local content and language policy that promote local languages.

ICASA to effectively enforce compliance through requiring broadcasters to submit broadcast recordings for assessment compliance of programming format of the licensee.

The Department of Communications, ICASA and MDDA to conduct quarterly station visits to proactively assist in areas of non-compliance and any technical issues licensees may experience.

7.4. OWNERSHIP AND CONTROL

What defines community broadcasting is the subject of considerable debate. It has been described in many ways as participatory or citizen media, radical media or alternative media. The Community Broadcasters should operate with a model that recognises the active audience.

One thing agreed on is that community media contributes significantly to the pool of media voices available Community broadcasting in particular as an alternative medium to public service and commercial media, fosters citizen participation and helps to preserve cultural diversity. Most importantly, since its beginnings community broadcasting in South Africa has been local media, the voices of communities that echo their interests and concerns.

The Electronic Communications Act, Act 36 of 2005 Section 50 (a) provides the applicant of community broadcasting service licenses must be fully controlled by non-profit entity and carried on or is to be carried on for non-profit purposes (b) the applicant intends to serve the interests of the relevant community.

Based on the engagement with stakeholders three business models are currently in operation in the community TV sector are **Private commercial community TV** model which is driven purely by commercial imperatives. Although this model seems more attractive as it does not rely on any government support, it presents the following shortcomings: firstly, it is inconsistent with the definition of a community TV as its ownership will be invested in private interests who will use to pursue commercial interest. Secondly, it can only survive in major metropolitan areas with strong advertising base. Thirdly, while the **Private commercial community TV** appears very attractive based on its public private partnership model, it is not currently provided for in policy. It, therefore survives on the basis of being legislatively/regulatory non-compliant. Should ICASA enforce the compliance, the model will collapse.

A community radio TV/ Local Metropolitan model as represented by Cape TV. In addition to being based on community radio, this model operates on a smaller scale. Similar models exist in countries such as Canada. While being attractive due to its conformity to community broadcasting definition, it has its own challenges: Firstly as community radio has shown, it cannot survive without government support. Secondly, it is not attractive to investment both government and private. Thirdly, it is a purely a social enterprise that will not create economies of scale nor grow the sector.

Provincial Community TV which has a provincial scope. The model encourage investment, including strategic infrastructure investment and innovation in the communication sector, develop and promote SMME, ensure that broadcasting services, viewed collectively promote the provision and development of a diverse range of sound and television broadcasting services on a national, regional and local level that cater for all language and cultural groups and provide entertainment, education and information.

Majority of submissions has requested the government to consider the Provincial Model with the focus of funding all community stations within the particular province through MDDA.

The Department should clarify its concept of provincial community television, and develop a clear, coherent proposal for the envisaged model, particularly to the business model and governance. Which then requires a proper public discussion. It is according to the submissions that the concept must remain clearly within the existing legal and regulatory framework for community broadcasting.

However, the submission from the practitioners of Community TV has emphasised that it should be a representative of real geographic communities or communities of interest, and should not to be beholden to commercial or government imperatives and interests.

Government Proposed Policy Position:

The view of Department on ownership and Control is that the Community Broadcasting should be fully controlled by a non-profit entity and carried on or is to be carried on for non-profit purposes and serve the interest of the relevant community, (The Electronic Communications Act, Act 36 of 2005 Section 50 (a - d). Community radio is a non-profit entity. Therefore, no shares can be sold or bought. Whatever money generated by the station, should be used towards it and community projects.

7.5. MANAGEMENT OF THE COMMUNITY BROADCASTING SUPPORT SCHEME

The establishment of a community radio is informed by the constitutional need to diversify and provide access to the media by communities, particularly rural communities who due to socio-economic conditions solely rely on radio for information, entertainment and education. The MDDA is a development agency set up as a partnership between the South African government and major print and broadcasting companies to assist in developing the community and small commercial media in South Africa.

The South African Government has long identified the community broadcasting sector development, one of the key priorities for the Republic. This is the result of the unique position that community broadcasting occupies in the South African broadcasting or media landscape in terms of promoting of diverse range of viewpoints, and the potential role it has in providing information, particularly for those in the rural and under-served areas.

Long before the commencement of the community broadcasting support programme in 1998, Government had recognized that community broadcasting would not be sustainable without deliberate and aggressive government assistance. The support programme was therefore, initiated and managed by the Department of Communications.

The submissions on the management of the community broadcasting support scheme were strongly of the view that the scheme should be transferred to MDDA, however the current institutional review of the MDDA must be undertaken to assess its Governance, management and technical capacity. Department of Communication's should drive policy implementation, stakeholder interaction, and sector-mobilisation and conduct aspects of research into the sector to inform policy. Clarity is required on what will happened after the three years of the

scheme – particularly as it is incorrect to assume that community broadcasters will have become financially sustainable within that time period

Rather than establishing a business unit within the Department of Communications to run community broadcasting support directly, it should help sort out the challenges in the implementing agencies to ensure they are able to meet their mandates

The stakeholders emphasised that the Department should leave programme production to broadcasters. The role of communicating government messages should be clearly separated from the function of enabling community media and the Department should explicitly recognise the central importance of protecting the independence of community broadcasters.

The emphasis stakeholders have strongly highlighted that areas of support should be transferred to entities. A single entity needs to manage the scheme, and it should include sectoral representation, besides the stakeholder interaction and engagement. Community radio must have a media office in Parliament just like any other media houses.\

Government Proposed Policy Position:

The view of Department should be to focus on the Policy development and Community Broadcasting Support programme should be transferred to MDDA as supported by the submissions. The scheme should be transferred to MDDA, however the current institutional review of the MDDA must be undertaken to assess its Governance, management and technical capacity. Department of Communication's to drive policy implementation, stakeholder interaction, sector-mobilisation and conduct aspects of research into the sector to inform policy. A single entity needs to manage the scheme, and it should include sectoral representation, besides the stakeholder interaction and engagement.

Department to investigate ways of making it easier for community broadcasters to be complaint with complex requirements for accessing MDDA funding process as a concern from the Sector.

7.6. PROCESS TO ACCESS SUPPORT

The MDDA is a development agency set up as a partnership between the South African government and major print and broadcasting companies to assist in developing the community and small commercial media in South Africa.

The agency offers support through Grant funding for (non-profit) and small commercial media projects. (Including print, radio, television, electronic/ new media etc). MDDA is at a good position to manage the scheme as the specific forms of support that varies from project to project are already in place and community broadcasters are familiar with Compliance and criteria for eligibility. The MDDA encourages the good governance practices, financial management of the project.

The MDDA Board is a representative of the skill sets and experience needed to dispense of the duties entrusted on the board. The Board is responsible for adjudicating all applications received by the MDDA. The Board meets four times a year to review applications. In general, it takes about two months for a MDDA to assess an application and prepare for submission to the Board. The more complete and detailed the application is, the easier it is to assess. The notification of the outcome is within two weeks of the Board Meeting.

The community broadcasting support scheme should adopt the MDDA criteria taken into account when the Board adjudicates an application which are the extent to which the project promotes media development and diversity such as:

- The likely impact of the project on historically disadvantaged communities and persons not adequately served by the media
- The likely impact of the project on historically diminished indigenous language and cultural groups
- The extent to which the project encourages ownership, control, participation and access to media by historically disadvantaged communities and persons
- The extent to which the project develops human
- Mentorship to assist with feasibility studies, setting up governance, financial and administration systems

Government Proposed Policy Position:

The view of the Department on the process and credibility to access the support is to endorse the MDDA processes as it is efficient and effective.

Regulator's Compliance report should be considered to determine if the stations' qualifies for support scheme.

7.7. LICENSING

ICASA is responsible for licensing, monitoring and ensuring compliance by all broadcasting licensees (including community broadcasters) with the EC Act, Broadcasting Act, all applicable regulations, and the licence terms and conditions which include requirements pertaining to: Programming obligations (format, language etc.), Financial Management, Control Structure, Management Structure and Community Participation.

The Electronic Communications Act, Act 36 of 2005 Section 50 (a) provides the applicant of community broadcasting service licenses must be fully controlled by non-profit entity and carried on or is to be carried on for non-profit purposes (b) the applicant intends to serve the interests of the relevant community.

The concern from the Sector is the failure of monitoring and compliance on the part of the Regulator has been exacerbated by the class license framework. The Scheme should speak to policies and regulations that are already in place for community TV and these regulations should be enforced. The moratorium of community TV licensing should remain in place until a new policy and regulatory framework for community TV has been developed. The stations that comply with regulations should qualify for support as soon as the Scheme is implemented. Those that do not comply should have their license taken away.

Proof of funding, and the financial viability of an applicant, are critical requirements in the assessment of applications for a broadcasting service licence without which a licence cannot be issued. Amongst the supporting documents to be submitted to ICASA for broadcast license application there is a strong emphasis that DoC should issue letters of commitment of financial support to the applicants.

The regulator should abandon the application process set out for Class Licenses and move towards a more open and transparent process which ensures that licenses are given to the most deserving, complaint, and representative applicants.

Government Proposed Policy Position:

The view of the Department as an addition to other requirements of licencing condition to community radio should be the proof of funding, and the viability of an applicant.

7.8. EXCLUSION OF NEW MEDIA

The scheme highlighted that stand-alone internet broadcasting services shouldn't be supported because of limited funds. The scheme should take a broader view of online media than simply online broadcasting. It was submitted that the scheme should make some allowance for the use by existing community media of new media projects.

Government Proposed Policy Position:

The view of the Department is that the scheme should support the community broadcasters licensed by ICASA and defined as community broadcasting as per ECA Act.

7.9. MANAGEMENT CONTRACTS

Most of the current licensed services are being managed by content/ service providers who provide funding, equipment and personnel who then have control of activities including being board members/ board of directors and management. Contracts are linked to licensed duration. Clarity is therefore requested on how contracts management issues will be managed.

Government Proposed Policy Position:

ICASA should emphasise the monitoring and ensuring compliance by all broadcasting licensees (including community broadcasters) with the EC Act, Broadcasting Act, all applicable regulations, and the licence terms and conditions

Community Broadcasting is not meant to be a competitive space but a space that provides communities with a voice, platform for disseminating of local news and discovering of talent, skills training for the youth in radio broadcast and sound engineering amongst others.

Community broadcasters are non-profit entities. Surplus funds must be invested for the benefit of the particular community. Community broadcasters must be free of

influence by any party, movement, organisation, body or alliance which is of party political nature.

8. CONCLUSIONS

The purpose of community broadcasting is to create an informed society but the point of this Position paper is to say that the sector needs informed funding mechanism and improved the condition the Sector is operating. A community broadcaster is community-owned, non-profit and reflects community concerns, help empower people and participation. All this is very valuable but on its own that is not enough for present purposes.

In recent broadcasting developmental years, a number of international developments have changed both the landscape of community broadcasting, licensing environment and the expectations for the community they operate and represents. A combination of factors have weakened the impact of community broadcasting support the mushrooming of community broadcasters in a single community, high signal distribution tariffs and rental funds for premises to host community broadcaster.

At the same time revenue through advertisement has fallen due to increase of licensed stations in the same vicinity and the broadcasting environment has become increasingly complex. Concerns about sustaining the sector are at the centre of the sector's continuous policy debates. The future well-being of the Sector depends on funding methods, competent and well trained management of the broadcasters.

Government and Public investments in programs counter the availability of funds, therefore there is a need to consider increasing the MDDA Community Media funding as the Agency is recommended by the Policy to manage the scheme. Beyond eliminating problems, the policy options of the scheme emphasised the need to skills development, knowledge, financial management and cooperative governance, to the sector.

For the well-being, the Sector needs to engage community on programming and the failure of that is very likely to have a negative consequences to the relation between that station and community.

Despite the limitations, there is a broad base of knowledge about how the Sector provides the voice of the Community and concentrate on the matters related to and affects the sector. The sector expands the opportunities for youth to acquire skills and experience. The community broadcasting programs should be based on developmental framework and provide solution to social ills; and should be based on a developmental framework.

Community broadcasting programmes needs ongoing evaluation to provide important insight to inform program design, selection and modification. This evaluation will also assist funders and policy makers make informed choices about which programs to fund.

Once finalised the community broadcasting scheme will determine the activities to be supported for the community broadcasting and the strong recommendation is to transfer the community broadcasting support programme to MDDA and the Department concentrate on policy development and Sector Funding mechanism.