



**BOTSWANA COMMUNICATIONS
REGULATORY AUTHORITY**



Discussion Paper

CAMPUS RADIO LICENSING FRAMEWORK

(DRAFT)
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1. INTRODUCTION

- 1.1. Botswana Communications Regulatory Authority (BOCRA) has been mandated through the Communications Regulatory Act [No. 19 of 2012] (CRA Act) to regulate the communications sector in Botswana, comprising telecommunications, internet and information and communication technologies, radio communications, broadcasting, postal services and related matters. BOCRA has further been mandated as per Section 6 (2) (r) of the CRA Act to make industry regulations necessary for its responsibilities under the Act such as Codes and rules of conduct.
- 1.2. BOCRA has licensed 3 commercial FM terrestrial radios and has authorised non-commercial broadcasting in Internet Protocol (IP) platform. Only 1 campus radio has been authorised to broadcast on IP platform. The licensing of non-commercial radio's on terrestrial platform has been constrained by the unavailability of adequate frequency resources.
- 1.3. Campus radio has the ability to enhance the value of education offered. With graduate unemployment hitting crisis level, it is important that institutions of higher learning are able to train students in order to make them ready for the job market, not only as employees but as entrepreneurs as well. The academic institutions have also made several requests for terrestrial Campus radio licenses hence BOCRA proposal to introduce Campus Radio licensing.

2. RATIONALE

- 2.1. BOCRA held a Consultative National Broadcasting Conference (NBC) in October 2018. The consultative NBC2018 called for licensing of campus radios in order for universities to have a training platform for media students to ready them practically for the market. The Authority has also received applications from different tertiary schools in the past, requesting to operate radio stations.

- 2.2. BOCRA also undertook a market review in 2018 where an assessment of FM broadcasting was done for both commercial and non-commercial stations. A comparison was done with other African countries and Botswana was found to be lacking on non-commercial stations.
- 2.3. It is in this light that the Authority developed a Discussion Paper to consult stakeholders on Licensing Framework for Campus Radio which will include but be not limited to, the necessary regulatory tools such as Application and Assessment Procedures, the License Types and Templates, duration, coverage, fees, operations, etc.

3. CATEGORIES OF BROADCASTING

- 3.1. Botswana's legislation has effectively defined three categories of broadcasting; Commercial and Non-Commercial. The third category, State Broadcasting is exempted from Regulation. The two categories are based on different aspects ranging from transmission purpose, roll out, target market, ownership & control, funding and revenue generation.
- 3.2. Commercial Broadcasting means a broadcasting service operated for profit and controlled by a person who is not a public or community broadcasting licensee.
- 3.3. Non-Commercial Broadcasting means a broadcasting service which;
 - 3.3.1. is fully controlled by a non-profit entity and carried on for non-profitable purposes;
 - 3.3.2. serves a particular community;
 - 3.3.3. encourages members of the community served by it, or persons associated with or promoting the interests of such community to participate in the selection and provision of programmes to be broadcast in the course of such broadcasting services; and

- 3.3.4. may be funded by donations, grants, sponsorship or advertising or membership fees, or by any combination of the above;
- 3.4. The non-commercial broadcasting can be classified based under different categories like;
 - 3.4.1. Group of persons with Ascertainable common interest such as religion, farming, academic etc;
 - 3.4.2. Sector of the public such as Tribal; or
 - 3.4.3. Geographically founded.
- 3.5. Both commercial and non commercial categories are critical in the industry. While the commercial broadcasting driven by profit and aims to make direct financial empowerment, the non-commercial broadcasting closes the market gaps and push content which although is important for audience consumption does not promote revenue generation. Non-commercial stations have tend to be the training ground for commercial stations as they usually use personnel from the community who after gaining some experience and expertise to enhance their current skills before entering the commercial environment.. The non-commercial radio stations can be used for academic purposes as well.

4. EXISTING BROADCASTING LICENSING FRAMEWORK

- 4.1. BOCRA currently has adopted commercial broadcasting licensing framework which only covers commercial operations as follows:
 - 4.1.1. Terrestrial Radio Broadcasting;
 - 4.1.2. Terrestrial Television Broadcasting;

4.1.3. Satellite Television Broadcasting;

4.1.4. Network Facilities Provider (NFP) and

4.1.5. Subscription Management Service

4.2. The lack of a non-commercial licensing framework acts as a hindrance to the broadcasting industry as the Authority is unable to licence non commercial broadcasters in the absence of the framework. This situations affects sectors such as the academies which require radio and television stations as tools for training..

5. BENCHMARKING

5.1. The Authority carried a out desktop research and established that other countries have generally licensed campus radio under the categories of commercial and non-commercial radio broadcasting. Countries such as Namibian, South Africa, Malawi and Zimbabwe all have operational Campus Radios. South Africa has 11 Campus Radio stations while Nigeria has 21 and Ghana 12. Some campus radios are commercial while others are non-commercial depending on the country's adopted broadcasting licensing framework.

6. AIM OF CAMPUS RADIO

6.1. Campus radio offers several benefits both strategically and pedagogically. It is a strategic advantage as it is a key medium for tertiary schools to reach out and interact with their students. They also place local tertiary schools at a competitive edge when compared with other schools outside the country hence these will be able to attract international students. Pedagogically it is an excellent initiative to improve multimedia radio class projects like content production, news and current affairs, advertising and the general broadcasting principles as applied when broadcasting content.

6.2. The objective of rolling out Campus Radios is to provide tertiary schools with the

ability to have a platform which students can use during training while being sharpened to work in the industry. Currently both state and commercial stations have to start with on the job training, and coaching of the actual operations of broadcasting equipment and the sensitivity of broadcasting live.

- 6.3. The Campus Radio is also a platform used to reach to the school community (students, lecturer, other workers) for efficient information dissemination.
- 6.4. Campus radio allows for inclusive atmosphere within the school environment. It encourages interaction, co-operation and communication within the school community that fully reflects the community to the world. It has been established that audiences are attracted to content which they can relate to and has impact on their daily lives. The student community serves as a viable market that needs to have access to broadcasting services which are tailor made to their needs.

7. TERRESTRIAL PLATFORMS

General Terrestrial Coverage

- 7.1. Terrestrial coverage can be provided in as local, regional or national coverage.
- 7.2. Local coverage means coverage area of a terrestrial broadcasting transmitter confined to locality within a town/village and does not exceed a radius of 3 km from the transmitter. Regional coverage means area of a terrestrial broadcasting transmitter intended to cover a town/village or a group of town/village(s) and does not exceed a radius of 50Kms from the transmitter. National Coverage means the whole territory and is achieved by several transmitters

Analogue Terrestrial

- 7.3. Terrestrial Audio broadcasting has predominately been carried out in 2 analogue technologies, FM broadcasting and AM Broadcasting.
- 7.4. FM broadcasting is a technique of radio broadcasting using Frequency Modulation (FM) technology whereby the frequency of the carrier signal is varied to relay the broadcast. It covers frequencies from 87.5 MHz to 108 MHz. FM

broadcasting transmission technology is currently used by all radio broadcasters in Botswana.

- 7.5. Amplitude Modulation (AM) broadcasting is a technique whereby the amplitude or the strength of the carrier is varied to relay the broadcast. It covers frequency ranges of 535 -1605 kHz. Currently in Botswana only Radio Botswana has some AM broadcasting.
- 7.6. There are advantages and disadvantages of both technologies, but FM has been more desirable because of its better sound quality. The trend in most of the countries has been that AM transmissions are being switched off, especially in areas that FM is available. AM still has an advantage of much wider coverage and potential to accommodate many broadcasts.

FM Frequency Challenge

- 7.7. The FM frequencies are governed by the GE84 Agreement and this agreement has only provided for 6 FM frequencies per broadcasting area. As an example, in Gaborone (or Gabane Site as identified in GE84) the frequencies, 89.9 MHz (RB1), 93 MHz (DUMAFM), 96.2 MHz (GABZFM), 103 MHz (RB2), 106.6 MHz (YARONAFM), 99.5 MHz (Not allocated) have been provided for.
- 7.8. With 5 National Licenses issued, it means that there is only one more frequency available for allocation at each site thus constraining additional licenses to only 1 institution or entity.

Digital Terrestrial Radio

- 7.9. FM radio has so far served the broadcasting sector well. The satisfactory sound quality of FM transmission coupled with the availability of cheap receivers in the market has made FM a worldwide service of choice. Unfortunately, as discussed frequencies are not available to roll out new services. This has necessitated the introduction of Digital Terrestrial Radio. Digital radio technology effectively transmits sound over digital signal platform and a digital radio is required for



reception.

- 7.10. Over and above the benefit of frequencies, the digital technology offers additional features such as better sound quality, easy tuning of radio stations, additional data services, and much more radio stations.
- 7.11. Several digital terrestrial radio technologies are available today such as, DAB, DAB+, DRM, DRM+, IBOC, ISDB-TSB etc. The choice of the technology depends mainly on:
- i. the available frequency bands
 - ii. receiver equipment availability and price; and
 - iii. number of services to be carried.
- 7.12. Many countries around the world have rolled out digital radio, many more are doing trials while a few, like Norway have even managed to switch off the analogue (FM) service. In Botswana, no digital terrestrial radio has been licensed in any frequency band, but the regulator allows pilot projects to interrogate potential viability. The biggest challenge to roll out of digital radio is the availability of receiver equipment.
- 7.13. Universities could consider a collaboration to build a single transmitter network in which transmitter costs could be shared and the institutions source low cost receivers for the students.

Other Platforms

- 7.14. Advancement of digital technology has made it possible for radio services to be accommodated in satellite TV bouquets and digital terrestrial TV bouquets as value-add services. While this provides additional platform that can be explored by campus radios, there is no mobility in this platform mode, primarily on satellite and some limitation of digital terrestrial TV. Mobility is one of the key factors of

radio.

8. PROPOSED CAMPUS RADIO FRAMEWORK

Definition

8.1. Campus Radio Broadcasting are radio services that:

- i. are provided within a tertiary school campus and its related establishments and is targeted primarily to the student population of that particular institution;
- ii. are provided with low power radio services broadcasting on terrestrial platform including AM, FM and digital;
- iii. may be streamed online or provide as value add on satellite or DTT bouquets; and
- iv. Operated on non-profit basis.

Timeslots or Programme Scheduling

8.2. The Authority recognises the complexity of a campus radio running 24 hours as the human resources used will mainly be lecturers and students of the concerned campus. The programming should at least cover 6 hours daily and the institutions are at liberty to repeat the same content to fill the 24 hrs.

8.3. The campus must provide the programming schedule of the station detailing the kind of content the station will broadcast. In a case where the campus intends to hook up other channels then there should be a submission of the kind of content, the source of the said content and timings of when such a service will be hooked up.

Language Diversity

8.4. The language situation in Botswana is trifocal with Setswana being the highest spoken language, English being the second and the minority languages coming

next.. Botswana is a multilingual country with approximately 28 languages. Setswana (Tswana) is the national language of Botswana, spoken by most of the demographic.. English is the official language, spoken by majority of the population

- 8.5. It is important that broadcasting promotes languages that are used in Botswana in order to promote identity, cultural diversity and national pride. Campus Radio broadcasting would be the platform to drive this imperative by providing for different languages within their capacity. The languages used in this should reflect the language needs and choices of the audiences that they serve.

Terrestrial Technology

- 8.6. Campus radio will be licenced to use low power AM or FM transmitters in line with Local Coverage.
- 8.7. Campus radio may be allocated digital terrestrial radio license provided the institutions can ensure access to receiving devices for the student community.

Coverage of the Campus Radio

- 8.8. Campus radio will only be licensed for local coverage, i.e. coverage area of a terrestrial broadcasting transmitter confined to locality within a town/village and does not exceed a radius of 3 km from the transmitter
- 8.9. In some cases, a tertiary school may wish to serve two or more campuses in close proximity (but nonetheless separate) that are in common ownership and form different parts of the same institution. This is permissible but requires the applicant to install a separate transmitter at each site.
- 8.10. If the campuses to be served are within 3 km of each other, they may be served by the same Campus Radio licence.
- 8.11. If the campuses are more than 3 km apart (but less than 15km), then a separate licence must be sought for each campus, but only if there will be different content



on the campuses.

- 8.12. Recognising the limitation of regional and National Coverage of frequencies in FM, an exemption for Regional Coverage of Campus radio may be granted by the authority, provided that;
- i. The frequency allocated is shared by several institutions;
 - ii. The sharing institutions proposes a sharing criterion which could specify the timeslots allocated to each institution; and
 - iii. The instructions propose a maintenance plan which will ensure the continuous running of the shared transmitters.
- 8.13. An exemption would also be granted for Regional Coverage where digital broadcasting is used. The authority will however mandate the institutions to share the frequency to effectively use the resources.

Funding of Campus Radios

- 8.14. The Campus Radios should be funded by the institution and may be funded through sponsorships, donations, fundraising and advertising. It must however be noted that advertising that will be permitted will be limited to generating enough to sustain the campus radio and is not meant to generate profit or exorbitant surplus.
- 8.15. Apart from the above funding models, Campus radios may engage volunteers, i.e. the unpaid labour and expertise of local residents who are committed to their campus station.
- 8.16. Institutions must carry out a separation of accounts in order for the Authority to be better positioned to assess the general performance of the Campus Radios in the market and impact.
- 8.17. Funding from political parties or candidates is prohibited.

Code of Practice

8.18. Campus Radio will be required to adhere to the existing Codes that govern the broadcasting sector, including but not limited to Code of Conduct for Broadcasters, Code of Conduct for Advertising, Code of Conduct for Election Coverage etc.

License Validity

8.19. The license is proposed to be valid for 5 years and renewable

License fees

8.20. The institutions will pay an application fee of P1000 and annual service fee of P1000.

8.21. The institutions will pay for Radio License of every transmitter that is operated in line with the existing Radio license fee.

9. MONITORING OF CAMPUS RADIO

9.1. Campus radio will be expected to adhere to all the broadcasting code and will be monitored same as the existing licensees. The Authority procured a Broadcasting Monitoring System which is currently used to monitor both radio and television broadcasting, including subscription management services and Over the Top content providers. This platform will be extended to include Campus Radio.

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