

Mr Davis Kgosimolao Moshweunyane
Manager: Broadcasting Frequency Coordination
350 Witch-Hazel Avenue, Eco Point Office Park Eco Park,
Centurion
South Africa Private Bag X10,
Highveld Park 0169
Centurion,
Pretoria

dmoshweunyane@icasa.org.za

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Public Consultations of the Draft National Radio Frequency Plan 2025

Dear Mr Moshweunyane

1. Introduction

- 1.1. The DRM SA group is pleased to make written representation on the draft National Radio Frequency Plan 2025 as gazetted on 4 April 2025, notice 3109 of 2025, gazette No. 52449. The Digital Radio Mondiale (DRM) South African Group is a local chapter of the International [DRM Consortium](http://www.drm.org) (www.drm.org). Our objectives are.
 - **Promote DRM** as the digital broadcasting standard of choice for South Africa and beyond
 - **Build widespread awareness** among broadcasters, government, manufacturers, suppliers, retailers and the public
 - **Champion adoption and influence** key stakeholders across the radio ecosystem
 - **Serve as South Africa's trusted DRM authority**, offering credible, up-to-date information and guidance on all things DRM
- 1.2. DRM is the universally open digital broadcasting system operating in all broadcasting frequencies, including the bands:
 - LW (148.5 kHz – 283.5 kHz),
 - MW (26.5 kHz – 1606.5 kHz),
 - SW (2.3 MHz – 26.1 MHz)) bands,
 - and VHF band I, II – (FM band - 87.5 MHz – 108 MHz) and III.

2. Submission

We have reviewed the **Draft National Radio Frequency Plan 2025** and have the following inputs to make.

2.1. Acronyms

We recommend the inclusion of the following Acronyms under Section 1.2,

- DRM – Digital Radio Mondiale.
- DSB – Digital Sound Broadcasting

2.2. Use of DRM for DSB in Broadcast Bands

2.2.1. DRM was adopted as a digital sound broadcasting standard through the following processes:

- Department of Communications and Digital Technologies issuing a policy directive on digital sound broadcasting (DSB) in November 2020 and
- the publication of regulations for DSB in April 2021 by ICASA.

2.2.2. We note that the sections specific to broadcasting in the National Table of Frequency Allocations, **Digital Sound Broadcasting** is listed in the columns; “*Typical Applications*” and “*Notes and Comments*”, which infers the use of both DRM and DAB+.

2.2.3. We submit that DRM is the only sound broadcasting standard that can be used in all broadcasting frequency bands LW (148.5 kHz – 283.5 kHz), MW (26.5 kHz – 1606.5 kHz), SW (2.3 MHz – 26.1MHz), VHF band I, II – (FM band) and III.

2.2.4. We therefore recommend the inclusion of the following text “**DRM Digital Sound Broadcasting**” in all sound broadcast frequency allocations, where it can be applied according to ITU regulation ITU-R BS.2214-2, Chapter 4.

2.2.5. Motivation

- 2.2.5.1. With the introduction of digital sound broadcasting in the ICASA DSB regulations some of the broadcast frequency bands have been assigned to be utilised for DSB, alleviating the strain of the current fully occupied FM band.
- 2.2.5.2. The National Radio Frequency Plan 2025 should not be based on current limitations and be open for future extensions and developments according to National Regulations.
- 2.2.5.3. DRM can be used in all frequency bands and not just limited to MW and FM bands.
- 2.2.5.4. The advantage for broadcasters is they can cover more geographic areas using LW, MW and SW transmit frequencies, eliminating the need for multiple (sometimes 100s) transmitters to cover the whole country.
- 2.2.5.5. For the regulator the advantage is that they can utilise these traditional broadcast spectra for DSB (spectrum efficiency and optimal utilization).
- 2.2.5.6. For the listener the advantage is more programming received using the same DRM receiver at the same superior audio quality than FM.

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2.2.6. Table 1: DRM SA group proposed changes to the National Table of Frequency Allocations.

ITU Region 1 allocations and footnotes	South African allocations and footnotes	Typical Applications (DRM Recommendations)	Notes and Comments (DRM Recommendations)
148.5-255 kHz BROADCASTING	148.5-160 kHz BROADCASTING	Broadcasting DRM Digital Sound Broadcasting.	Frequency Assignment Plan (GE75) applies.
255-283.5 kHz BROADCASTING	255-283.5 kHz BROADCASTING	DRM Digital Sound Broadcasting.	
526.5-1 606.5 kHz BROADCASTING	526.5-1 606.5 kHz BROADCASTING	Medium Wave Sound Broadcasting (535.5 -1606.5 kHz) Inductive Loop Systems (740 – 8800 kHz) DRM Digital Sound Broadcasting (DSB)	The Terrestrial Broadcasting Frequency Plan as amended (GG No. 36321) 02 April 2013 Radio Frequency Spectrum Regulations (Annex B) (GG. No.38641, 30 March 2015). Digital Sound Broadcasting (DSB) Regulations was published in GG44469 Notice 215 of 2021.
2 300-2 498 kHz BROADCASTING 5.113	2 300-2 498 kHz BROADCASTING 5.113	Sound Broadcasting DRM Digital Sound Broadcasting.	Terrestrial Broadcasting Frequency Plan 2013
3 200-3 230 kHz BROADCASTING 5.113	3 200-3 230 kHz BROADCASTING 5.113	HF Sound Broadcasting DRM Digital Sound Broadcasting.	Radio Frequency Spectrum Regulations (Annex B) (GG. No.38641, 30 March 2015). The Terrestrial Broadcasting Frequency Plan (GG no.36321) 02 April 2013

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3 230-3 400 kHz BROADCASTING 5.113	3 230-3 400 kHz BROADCASTING 5.113	HF Sound Broadcasting DRM Digital Sound Broadcasting.	The Terrestrial Broadcasting Frequency Plan (GG no.36321) 02 April 2013
3 950-4 000 kHz BROADCASTING	3 950-4 000 kHz BROADCASTING	HF Sound Broadcasting DRM Digital Sound Broadcasting.	The Terrestrial Broadcasting Frequency Plan (GG no.36321) 02 April 2013
4 750-4 850 kHz BROADCASTING 5.113	4 750-4 850 kHz BROADCASTING 5.113	HF Sound Broadcasting DRM Digital Sound Broadcasting.	The Terrestrial Broadcasting Frequency Plan (GG no.36321) 02 April 2013
5 005-5 060 kHz BROADCASTING 5.113	5 005-5 060 kHz BROADCASTING 5.113	HF Sound Broadcasting DRM Digital Sound Broadcasting.	The Terrestrial Broadcasting Frequency Plan (GG no.36321) 02 April 2013
5 900-5 950 kHz BROADCASTING 5.134	5 900-5 950 kHz BROADCASTING 5.134	HF Sound Broadcasting DRM Digital Sound Broadcasting.	The Terrestrial Broadcasting Frequency Plan (GG no.36321) 02 April 2013 Refer to footnote 5.134 "Administrations are encouraged to use these frequency bands to facilitate the introduction of digitally modulated emissions in accordance with the provisions of Resolution 517 (Rev.WRC-19). (WRC-19)"
7 200-7 300 kHz BROADCASTING	7 200-7 300 kHz BROADCASTING	HF Sound Broadcasting DRM Digital Sound Broadcasting.	
7 300-7 400 kHz BROADCASTING 5.134	7 300-7 400 kHz BROADCASTING 5.134	HF Sound Broadcasting DRM Digital Sound Broadcasting.	
	7 350-7 400 kHz	HF Sound Broadcasting	

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	BROADCASTING 5.134	DRM Digital Sound Broadcasting	<p>The Terrestrial Broadcasting Frequency Plan (GG no.36321) 02 April 2013</p> <p>Refer to footnote 5.134 "Administrations are encouraged to use these frequency bands to facilitate the introduction of digitally modulated emissions in accordance with the provisions of Resolution 517 (Rev.WRC-19). (WRC-19)"</p>
7 400-7 450 kHz	7 400-7 450 kHz	HF Sound Broadcasting Inductive Loop Systems (7400 – 8800 kHz)	
BROADCASTING	BROADCASTING	DRM Digital Sound Broadcasting	
9 400-9 500 kHz	9 400-9 500 kHz	HF Sound Broadcasting	
BROADCASTING 5.134	BROADCASTING 5.134	DRM Digital Sound Broadcasting	
9 500-9 900 kHz	9 500-9 775 kHz	HF Sound Broadcasting	
BROADCASTING	BROADCASTING	DRM Digital Sound Broadcasting	
	9 775-9 900 kHz	HF Sound Broadcasting	
	BROADCASTING	DRM Digital Sound Broadcasting	
11 600-11 650 kHz	11 600-11 650 kHz	HF Sound Broadcasting	
BROADCASTING 5.134	BROADCASTING 5.134	DRM Digital Sound Broadcasting	
11 650-12 050 kHz	11 650-11 700 kHz 11 700-11 975 kHz 11 975-12 050 kHz	HF Sound Broadcasting	
BROADCASTING		DRM Digital Sound Broadcasting	
12 050-12 100 kHz	12 050-12 100 kHz	HF Sound Broadcasting	
BROADCASTING 5.134	BROADCASTING 5.134	DRM Digital Sound Broadcasting	
13 570-13 600 kHz	13 570-13 600 kHz	HF Sound Broadcasting	

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BROADCASTING 5.134	BROADCASTING 5.134	DRM Digital Sound Broadcasting	<p>The Terrestrial Broadcasting Frequency Plan (GG no.36321) 02 April 2013</p> <p>Refer to footnote 5.134 "Administrations are encouraged to use these frequency bands to facilitate the introduction of digitally modulated emissions in accordance with the provisions of Resolution 517 (Rev.WRC-19). (WRC-19)"</p>
13 600-13 800 kHz	13 600-13 800 kHz	HF Sound Broadcasting DRM Digital Sound Broadcasting	
BROADCASTING	BROADCASTING		
13 800-13 870 kHz	13 800-13 870 kHz	HF Sound Broadcasting DRM Digital Sound Broadcasting	
BROADCASTING 5.134	BROADCASTING 5.134		
15 100-15 600 kHz	15 100-15 600 kHz	HF Sound Broadcasting DRM Digital Sound Broadcasting	
BROADCASTING	BROADCASTING		
15 600-15 800 kHz	15 600-15 800 kHz	HF Sound Broadcasting DRM Digital Sound Broadcasting	
BROADCASTING 5.134	BROADCASTING 5.134		
17 480-17 550 kHz	17 480-17 550 kHz	HF Sound Broadcasting DRM Digital Sound Broadcasting	
BROADCASTING 5.134	BROADCASTING 5.134		
17 550-17 900 kHz	17 550-17 900 kHz	HF Sound Broadcasting DRM Digital Sound Broadcasting	
BROADCASTING	BROADCASTING		
18 900-19 020 kHz	18 900-19 020 kHz	HF Sound Broadcasting DRM Digital Sound Broadcasting	
BROADCASTING 5.134	BROADCASTING 5.134		

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21 450-21 850 kHz BROADCASTING	21 450-21 850 kHz BROADCASTING	HF Sound Broadcasting DRM Digital Sound Broadcasting	The Terrestrial Broadcasting Frequency Plan (GG no.36321) 02 April 2013. ITU RR Article 12 Planning Procedures applies
25 670-26 100 kHz BROADCASTING	25 670-26 100 kHz BROADCASTING	HF Sound Broadcasting DRM Digital Sound Broadcasting	The Terrestrial Broadcasting Frequency Plan (GG no.36321) 02 April 2013. ITU RR Article 12 Planning Procedures applies
87.5-100 MHz BROADCASTING	87.5-100 MHz BROADCASTING	FM Sound Broadcasting (87.5-108 MHz) DRM (87.5-100 MHz) Digital sound broadcasting (DSB)	The Terrestrial Broadcasting Frequency Plan (GG no.36321) 02 April 2013 Geneva agreement GE84 Digital Sound Broadcasting (DSB) Regulations was published in GG44469 Notice 215 of 2021
100-108 MHz BROADCASTING	100-108 MHz BROADCASTING	FM Sound Broadcasting (87.5-108 MHz) DRM (100-108 MHz) Digital sound broadcasting (DSB)	The Terrestrial Broadcasting Frequency Plan (GG no.36321) 02 April 2013 Geneva agreement GE84 Digital Sound Broadcasting (DSB) Regulations was published in GG44469 Notice 215 of 2021
174-223 MHz BROADCASTING	174-223 MHz BROADCASTING	Analogue Television Broadcasting (174 – 214 MHz) T-DAB (214 – 230 MHz) DRM (174 – 223 MHz) Digital Sound-Broadcasting Digital Television Broadcasting (174 – 214 MHz) Wireless microphones (173.7 – 175.1 MHz)	TV Band III Migration from analogue to digital is harmonised in SADC. Digital Sound Broadcasting (DSB) planned in this band. TV Band III Regulations was published in GG44469 Notice 215 of 2021 The Terrestrial Broadcasting Frequency Plan as amended (GG no.36321) 02 April 2013 Radio Frequency Spectrum Regulations (Annex B) (GG. No.38641, 30 March 2015)

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223-230 MHz BROADCASTING	223-230 MHz BROADCASTING	T-DAB (214 – 230 MHz) DRM (223-230 MHz) Digital Sound Broadcasting	Migration from analogue to digital is harmonised in SADC. Digital sound broadcasting is being planned in this band. Digital Sound Broadcasting (DSB) Regulations was published in GG44469 Notice 215 of 2021 The Terrestrial Broadcasting Frequency Plan as amended (GG no.36321) 02 April 2013
230-235 MHz BROADCASTING	230-238 MHz BROADCASTING 5.252	Digital Television Broadcasting (230 – 238 MHz) DRM (230-238 MHz) Digital Sound Broadcasting	The Terrestrial Broadcasting Frequency Plan as amended (GG no.36321) 02 April 2013 Digital Sound Broadcasting (DSB) Regulations was published in GG44469 Notice 215 of 2021
	238-246 MHz BROADCASTING 5.252	DAB+ (238-242.95 MHz) DRM (238-246 MHz) Digital Sound Broadcasting	Digital Sound Broadcasting (DSB) Regulations was published in GG44469 Notice 215 of 2021
	246-254 MHz BROADCASTING 5.252	Digital Television broadcasting (246-254 MHz) DRM (238-246 MHz) Digital Sound Broadcasting	Digital Sound Broadcasting (DSB) Regulations was published in GG44469 Notice 215 of 2021

We appreciate the opportunity to make this written submission to the Draft National Radio Frequency Plan 2025. Our recommendations will contribute to the efficient use of spectrum which is in the national interest of the country.

We will be pleased to participate in oral presentations to verbally motivate the recommendations made in this submission.

We look to a positive response to our proposals.

Yours Truly,



RUXANDRA OBREJA
Chairperson
DRM Consortium
Email: ruxandra.obreja@drm.org
Tel: +44 7801 624916



ALDRED DREYER
Chairperson
DRM SA Group
Email: aldred@drmsa.org
Tel: +27 82 459 6149