National Association of Broadcasters

The Independent Communications Authority of South Africa
The Chairperson, Mothibi G. Ramusi
350 Witch-Hazel Ave
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Centurion, 0144

For the attention of: Mr Davis Kgosimolao Moshweunyane / Mr Manyaapelo Richard Makgotlho

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Dear Chairperson

DRAFT NATIONAL RADIO FREQUENCY PLAN 2025

1. The National Association of Broadcasters (**NAB**) refers to the publication by the Independent Communications Authority of South Africa (the **Authority**) for public consultation of the Draft National Radio Frequency Plan 2025 in Government Gazette 52449 on 4 April 2025 in the Government Gazette No. 52449, Notice 3109 of 2025 (the **Draft Radio Frequency Plan**).

2. The NAB is a leading representative of South Africa's broadcasting industry, representing the interests of all three tiers of broadcasters (public, community and commercial). Our members include the SABC, all the licensed commercial television broadcasters; e.tv, Multichoice, M-Net, independent commercial radio broadcasters such as Kaya FM, YFM, Smile FM, Rise FM, YOU FM, Hot 102.7FM, and radio services of media groups Primedia, Kagiso Media, GH Media, AME, MSG Afrika and a number of community radio broadcasters, and a community television broadcaster, Faith Terrestrial. The NAB membership also extends to signal distributors as well as a range of industry associates.

3. The NAB welcomes the invitation by the Authority to make representations on the Draft Radio Frequency Plan. The NAB understands that individual NAB members may be making detailed and technical submissions to the Authority on the Draft Radio Frequency Plan. As such, the NAB will not address each and every aspect of the Draft Radio Frequency Plan, but will provide high-level submissions on key principle concerns relating to the broadcasting

spectrum used by sound and terrestrial television broadcasters. The NAB will not be providing any input on the 470 to 694 MHz band, which is reserved for DTT-T2 Digital Terrestrial TV, save to note that it appears that the terrestrial assignments below 694MHz (i.e. in the 470MHz to 694MHz band) have been correctly captured as per the migration two years ago. The NAB participates in this process with the aim of providing constructive input for ICASA and looks forward to engaging further with the Authority on these issues, including participating in oral hearings.

526.5 to 1605.5 kHz band

4. The NAB notes that the Draft Radio Frequency Plan does not mention or make provision for digital sound broadcasting in the 526.5 to 1605.5 kHz band, which is used for Medium Wave Sound Broadcasting. This band is also used for DRM30 transmissions.

87.5MHz to 100MHz and 100MHz to 108MHz bands

5. In respect of the 87.5MHz to 100MHz and 100MHz to 108MHz bands, the NAB notes that these bands are allocated extensively to analogue FM sound broadcasters throughout South Africa. While Digital Sound Broadcasting (**DSB**) is mentioned in the Draft Radio Frequency Plan, the Plan does not provide explicit details of DSB.

6. As the Authority is aware, South Africa is a signatory to the International Telecommunication Union (**ITU**) and falls under Region 1, which covers Europe, parts of the Middle East and the whole of Africa. This band covers the allocation of analogue FM services throughout the region. Channel spacing for Region 1 is 100kHz. In Region 2, which covers the Americas, the channel spacing is 200kHz. In Region 3, which covers Asia and Oceania , the channel spacing is also 200kHz. At present, the only places where DSB services have been introduced into the FM band are in Region 2 (as part of the American HD radio system) and Region 3 (in the Philippines, using offset frequencies).

7. The NAB notes that the coordination of DSB services in Region 1, in an already overcrowded FM band (in Gauteng, Western Cape and KZN), using the Region 1 FM band is impossible. It is submitted that in less congested areas, the Region 1 FM band could be used, but that this would need to be handled with care, especially in respect of South Africa's neighbouring countries.

8. In respect of in-band cross modulation interferences in FM Analogue receivers, the NAB notes that besides the domestic receiver, Sentech uses Relay Broadcast Receivers (**RBR**) extensively to feed many of its transmitter sites throughout the country and interference to these services could pose a problem.

9. The NAB has further concerns that there may be orthogonal frequency-division multiplexing (**OFDM**) interferences onto aeronautical radio navigation devices in the adjacent band above 108MHz. The NAB encourages the Authority to be mindful of using any offset frequencies for DSB services that do not adhere to the Region 1 band plan for analogue FM services. This may cause serious interference to existing licensed analogue FM broadcasters.

174 to 214 MHz and 214 MHz-230 MHz

10. The lower part of VHF band 3, 174 MHz to 213 MHz has been allocated for Very High Frequency (**VHF**) Digital Terrestrial Television (**DTT**) T2 Broadcasting Analogue TV services. The NAB notes, however, that there is no indication in the Draft Radio Frequency Plan from television operators on whether they will use all or part of this spectrum, considering that DTT T2 services have been made available nationally on Band 4 UHF 470MHz to 694MHz (as part of the 7-Mux plan). Roll out on VHF would require consumers to have both VHF and Ultra High Frequency (**UHF**) outdoor antennas. The NAB submits that these lower frequencies would be better utilised for Terrestrial Digital Audio Broadcasting (**T-DAB**), especially for mobile reception. T-DAB receivers tune from 174.928 MHz to 239.200 MHz as standard.

214 to 230 MHz

11. The NAB notes that this spectrum was adopted by SADC for T-DAB but this band may not offer enough spectrum in South Africa for future national rollout, considering the needs of broadcasters in South Africa.

230 to 238 MHz

12. The NAB notes that this spectrum is allocated for Digital TV DTT-T2. It is unclear whether the Authority has engaged with television broadcasters to ascertain if there is a need to allocate this spectrum for Digital TV DTT-T2. A large allocation for digital TV in the VHF band has already been made. The NAB submits that this could be used, instead, for T-DAB.

238 to 242.95 MHz

13. The NAB welcomes the consideration of this spectrum for T-DAB as the current joint SADIBA/NAB DAB+ trial operates on the 239,200MHz (channel 13F) band and it was found that this frequency can be used nationally.

1452 to 1492 MHz

14. This band has an allocation for T-DAB. The NAB notes that since 2009, no T-DAB receivers have been manufactured with the L-band and no countries in Region 1 are using the L-Band spectrum. L-Band was only available in receivers designed for the older first-generation classic T-DAB standard and has not been used in the second-generation DAB+ standard, where it has been adopted. The NAB submits that this spectrum can be released.

15. The NAB thanks the Authority again for the opportunity to make representations on the Draft Radio Frequency Plan and avails itself to engage further with the Authority on the above submissions, including participating in any oral hearings.

Yours sincerely

Nadia Bulbulia
Executive Director