Association of Comms & Technology

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13 June 2025

Mr Mothibi Ramusi
Chairperson
Independent Communications Authority of South Africa
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Dear Chairperson

**ACT SUBMISSION- NOTICE REGARDING THE DRAFT NATIONAL RADIO FREQUENCY PLAN 2025 FOR PUBLIC CONSULTATION**

The Association of Comms and Technology (ACT) welcomes the opportunity to comment on ICASA's "Draft National Radio Frequency Plan 2025". and Opportunistic Spectrum Management in the Innovation Spectrum bands. ACT is a leading industry association in South Africa, representing major telecommunications network operators.

It was founded in 2021 by the Chief Executive Officers (CEOs) of South Africa's six largest telecommunications operators—Vodacom, Telkom, MTN, Cell C, Liquid Intelligent Technologies, and RAIN. The formation of ACT was driven by the need to create a stronger, more coordinated voice on critical matters impacting the efficiency and effectiveness of the telecommunications industry and the broader ICT ecosystem in South Africa.

We acknowledge the necessity to ensure all frequency assignments done in accordance with the national radio frequency plan incorporating decision of the 2023 world Radiocommunication Conference (WRC-23).

As an industry association, we limit our submission to addressing common concerns among our members, as well as overarching principled issues.

1. **Incorporating WRC-23 outcomes and Band Plan:** It is recommended that the Authority leverage this update not only to incorporate WRC-23 outcomes but also to revise the Band Plan to reflect evolving spectrum usage. Specifically:

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a. **Reflect national spectrum usage changes** – Remove references to planned migrations or legacy spectrum uses where implementation has already been completed.

b. **Update typical spectrum applications** – For instance, remove fixed links from International Mobile Telecommunications (IMT) bands where such links have been fully migrated.

c. **Revise national and ITU references** – Ensure only the latest version of each Radio Frequency Spectrum Assignment Plan (RFSAP) is included by removing outdated versions.

d. **Apply editorial corrections** – Address issues such as duplicate references, inconsistent frequency band information across table columns, and improper placement of ITU footnotes. ITU footnotes should be aligned with best practices—either positioned next to the relevant service allocation or at the end of each frequency block as detailed in section 2.3 of the draft Frequency Plan. Additionally, date references for WRC Resolutions should be updated accordingly. Reference to PPDR in the 694-790 MHz frequency bands should be deleted as the spectrum is for IMT and has either been auctioned or will be licensed in the next licensing process.

e. **Ensure alignment with related strategic plans** – This draft National Radio Frequency Plan should be harmonised with the ongoing updates to the Frequency Migration Plan and the IMT Roadmap, both of which commenced in 2024 and are still pending finalisation.

f. **Recommendations not yet in force** – Any recommendations referenced in the document and not yet in force should be clearly indicated as provisional.

## 2. Introduction of New Radiocommunication Services and Applications.

The Association of Communications and Technology (ACT) recommends that the introduction of new radiocommunication services and applications must be undertaken in a controlled, coordinated, and procedurally fair manner:

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a. In previous editions of the National Radio Frequency Plan, Column 3 ("Typical Applications") primarily reflected the existing or established uses of each frequency band. In contrast, the current draft also includes numerous potential future services and applications, alongside existing ones.

b. The introduction of these new services or applications—such as International Mobile Telecommunications (IMT), High Altitude Platform Services (HAPS), Earth Stations on Vessels (ESV), Earth Stations in Motion (ESIMs), and IMT via High Altitude IMT Base Stations (HIBS)—be managed through a structured and consultative process to ensure proper coordination and minimal disruption.

c. Introducing new services without adequate coordination within bands already licensed and in use in South Africa should not be allowed as it could result in harmful interference to incumbent services or licensees.

d. Rectifying such interference could be technically complex and financially burdensome for both existing users and new entrants. Proactive planning and stakeholder engagement are therefore essential to safeguard the integrity and reliability of radiocommunication services.

3. **IMT700 and IMT750 (694–790 MHz)**

a. **Public Protection and Disaster Relief (PPDR) Allocation:** The Authority's IMT750 RFSAP allocates 20 MHz (738–758 MHz) for IMT, with a 5 MHz guard band (733–738 MHz), and is expected to form part of the upcoming High Demand Spectrum (HDS) licensing. As a result, only a theoretical 2x3 MHz remains available for PPDR in the 700 MHz band. However, compatibility concerns exist between the FDD-based PPDR and the TDD-based IMT allocation, which require technical verification.

b. **Digital Terrestrial Television (DTT) Migration:** The 694–790 MHz band, **formerly** used for analogue broadcasting, was cleared by 2023, with DTT services moved below 694 MHz. Broadcasting service allocations were removed from Column 2 (SA allocations) in the previous National Radio Frequency Plan update. Therefore, retaining the note on

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broadcasting migration above 694 MHz appears unnecessary and inconsistent.

c. **Fixed Links Note in Column 3:** The note stating that "fixed links will have to be migrated to accommodate IMT" is outdated and should be removed. Both IMT700 and IMT750 bands are designated exclusively for IMT services, with IMT700 already licensed through auction. Thus, no fixed links should remain in these bands, and retaining this note creates unnecessary regulatory uncertainty.

## 4. Frequency band 3600 – 4200 MHz

a. The band has been identified for IMT following WRC-23, which upgraded the mobile allocation to primary status. While this supports IMT use, the licensing process the Authority intends to follow remains unclear.

b. It is recommended that the Authority urgently develop a Radio Frequency Spectrum Assignment Plan (RFSAP) for the 3600–3800 MHz range for public comment.

c. Regarding the 3800–4200 MHz sub-band, the note encouraging operators to apply for spectrum licences and register C-band Earth stations lacks clarity. It appears to relate to the ongoing development of Regulations for Dynamic Spectrum Access (DSA) and Opportunistic Spectrum Management for the 3800–4200 MHz and 5925–6425 MHz bands.

d. The draft National Radio Frequency Plan should clearly reference this DSA process and explain the registration procedure for Earth stations, distinguishing it from the standard licensing process. The current note should be revised to explicitly reference the intended registration process under the DSA framework.

## 5. Frequency band 4800 – 5000 MHz

a. We support the development of a Radio Frequency Spectrum Assignment Plan (RFSAP) for the 4800–4990 MHz band.

b. Additionally, we recommend including a reference to the "Frequency Migration Plan (FMP), as amended" for the broader 4500–5000 MHz

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range, noting that migration of certain fixed links within this range is underway.

## 6. Frequency band 5925 – 6700 MHz

a. ACT supports the introduction of IMT services in the 6425–7125 MHz band, in line with the outcomes of WRC-23 and the positions adopted by South Africa, the Southern African Development Community (SADC), and the African Telecommunications Union (ATU) at the conference. The 5925–6425 MHz band has been designated for Wireless Access Systems/Radio Local Area Networks (WAS/RLAN) in accordance with ATU Recommendation 005-0 issued in July 2021. It is recommended that the Authority develops a RFSAP for IMT in the band 6425-7125 MHz. This is needed to ensure a transparent introduction of IMT in the band.

## 7. Frequency band 24.25 – 27.5 GHz

a. ACT supports the allocation of the 26 GHz band for IMT, as resolved at WRC-19, and recommends the development of a Radio Frequency Spectrum Assignment Plan (RFSAP) to guide its introduction. This plan should accommodate both IMT and Fixed Service (FS) links, promoting shared use of the band rather than exclusive IMT use.

b. Additionally, a reference to the amended Frequency Migration Plan (FMP) should be included, as details on the migration of fixed links will be finalised through the FMP update. While some migration may be necessary—particularly in urban areas to support IMT deployment—ACT supports the continued use of fixed links in the band on a shared basis.

## 8. Frequency band 37 – 43.5 GHz

a. ACT supports the development of a RFSAP for the 37–43.5 GHz band, including potential sub-band considerations. However, IMT deployment in this range should only be pursued after the 24.25–27.5 GHz band is implemented. Priority should then be given to the 40.5–43.5 GHz sub-band, aligned with ITU Region 1 developments and device availability.

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**9. Frequency band 45.5 – 47 GHz and Frequency band 66 – 71 GHz**

a. The 45.5–47 GHz and 66 – 71 GHz frequency band were identified for IMT by WRC-19, and we support the development of a Radio Frequency Spectrum Assignment Plan (RFSAP) for this band. However, we believe that IMT deployment in this band should only be considered once the 24.25–27.5 GHz band has been implemented. Future use of the 45.5–47 GHz and 66 – 71 GHz band for IMT should also be guided by the availability of compatible IMT devices.

We thank ICASA for the opportunity to provide these inputs and confirm our willingness to participate in any further public hearings or consultations.

Yours sincerely,

Ms Nomvuyiso Batyi

**Chief Executive Officer**
**Association of Comms and Technology ("ACT") NPC**