



13 June 2025

**Vodacom's Submission on the Authority's
"DRAFT NATIONAL RADIO FREQUENCY PLAN 2025"**



1. INTRODUCTION

Vodacom Pty Ltd (“Vodacom”) wishes to thank the Independent Communications Authority of South Africa (ICASA) for the opportunity to make a submission on the Authority’s “DRAFT NATIONAL RADIO FREQUENCY PLAN 2025” as published in the Government Gazette No. 52449 on 04 April 2025.

Vodacom appreciates the opportunity to submit written comments on the Draft National Radio Frequency Plan 2025 (NRFP-25), which reflects ICASA's commitment to harmonizing spectrum allocations with international standards, including the outcomes of World Radiocommunication Conference 2023 (WRC-23) and the 2024 edition of the ITU Radio Regulations.

Vodacom remains committed to supporting the Authority's efforts to ensure spectrum is managed efficiently, transparently, and in a manner that encourages innovation, infrastructure investment, and digital inclusion in South Africa.

2. GENERAL COMMENTS

Vodacom supports the objectives of the draft NRFP-25 plan and acknowledges its significance in promoting equitable access to spectrum resources, supporting emerging technologies (such as 5G, IoT, and satellite services), enhancing spectrum efficiency and national harmonization, and enabling policy certainty for long-term infrastructure investment at scale. Vodacom appreciates the Authority's inclusion of newly identified IMT bands and the intention to facilitate technology neutrality, refarming, and flexible spectrum use. However, there are areas where greater clarity and regulatory guidance could further strengthen the final NRFP-25 Plan.

Vodacom’s key recommendations are:

- Vodacom has long advocated for the **450-470 MHz** band to be exclusively allocated to IMT and supported the conclusion of the 2023 published RFSAP that all existing radio frequency spectrum licenses in this frequency band will be revoked as of 1 April 2023, except for cases of some government licenses and Transnet's existing assignment, which would have been amended by now. As per the RFSAP, the Authority indicated that it intends issuing an ITA after 1 April 2025. We urge the Authority to expedite this process in order to realise the benefits of this coverage band sooner, maximising the use of spectrum.
- The draft NRFP-25 permits high-altitude IMT base stations (HIBS) to operate in IMT bands (**700, 800 and 2600 MHz**) on a secondary basis. However, there is no technical guidance available for safeguarding primary licensees against **potential interference**. Vodacom recommends that ICASA publish a consultation or conduct a feasibility study on managing the coexistence of IMT and HIBS. This should clarify ICASA's plans for protecting primary licensees and the impact of HIBS on terrestrial networks.



- The Final RFSAP for the **IMT 1500** band (1427-1517MHz) has highlighted that there are no assignments in the **1500 MHz** band. The NRFP 2025 needs to be updated to reflect that a final RFSAP has already been issued. Further, we recommend making this band available for assignment in the upcoming/planned auction.
- A number of non-IMT licensees currently occupy the **3300-3800 MHz** band (excluding 3400 – 3600 MHz). These include fixed satellite stations, Point-to-multipoint and point-to-point wireless systems. We understand that there are no MOBILE licenses awarded for these parts of band – if this were the case, the Authority would have been expected to follow a consultation process given the high demand for MOBILE spectrum. Even though some of these licensees use IMT technology, they deliver non-MOBILE services as per their license conditions. Vodacom respectfully requests that ICASA accelerate the process of developing a clear national migration plan for current licensees who are not providing IMT MOBILE services, to exit this band, and as such make way for IMT MOBILE services that will have a far greater mass-market consumer benefit. The band must be made available for new IMT assignments through a fair and transparent assignment process. Accordingly, ICASA needs to also update and publish an amended RFSAP for this band. This plan should include migration timelines for current non-MOBILE users, as well as effective interim (until migration is completed) interference mitigation strategies for co-primary licensees, that allows for effective MOBILE deployment in the near-term by licensees that are awarded an IMT MOBILE assignment in this band.
- The **4800-4990 MHz band** has been identified as new IMT band. However, the NRFP-25 does not specify availability dates for commercial licensing. Vodacom respectfully requests the early development of the Radio Frequency Spectrum Assignment Plan (RFSAP) for all new IMT MOBILE bands, which is essential for enabling effective deployment in this newly allocated IMT bands. The RFSAP should include technical conditions, channel plans, migration plans and synchronization guidelines.
- Vodacom has a significant number of deployments in the **upper 6 GHz** band. This band offers lower propagation losses which enables longer hop length and higher capacities for backbone networks. Vodacom recommends that the Authority conducts a feasibility study on the coexistence of IMT and fixed links services prior to proceeding with reallocation to IMT.
- The **26 GHz** band has been identified as an IMT band. In previous engagements, Vodacom has suggested that the Authority consider assigning the 26.5-27.5 GHz range for IMT as a sweet spot between the 26 GHz and 28 GHz microwave bands, while the ecosystem develops, as a trial for the use of mmWave. Vodacom has several microwave deployments in this band and recommends that the Authority conduct a feasibility study on the coexistence of these services prior to proceeding with reallocation of the whole band to IMT.
- Vodacom supported ICASA's decision to conduct a feasibility study (as per its Frequency Migration plan) for the **37 and 45 GHz bands** prior to developing a RFSAP for IMT in these bands, to determine how these bands can be most efficiently used. The Authority is requested to kindly share feedback regarding this feasibility study before commencing with the development of an RFSAP.



3. REQUEST FOR CLARIFICATION

1. The plan highlights that the 700, 800, 2600 MHz has now been updated to allow HIBS to transmit on a secondary basis. The Authority is requested to clarify how it will ensure that primary licensees are protected from possible interference from the secondary (HIBS) licensees? In addition, this should not be a process the heavily relies on primary licensees to lodging complaints from interference.
2. In the upper 6 GHz, newly identified for IMT. The Authority is requested to clarify how will it ensure that the existing fixed links services are protected from the new IMT services?
3. Migration of out of 6 GHz band will be costly for Vodacom. However, should the Authority consider a migration plan which alternative band will the service be migrated to that will not amount of significant costs to migrate?
4. In the 26 GHz band. The Authority is requested to clarify the destination band should there be any migration.

4. CONCLUSION

Vodacom appreciates the Authority's invitation to engage in the consultation process for the Draft National Radio Frequency Plan (NRFP) 2025. We are pleased to express our support for the Authority's efforts, and we believe that with the recommended enhancements, the final NRFP-25 can provide a stronger foundation for an inclusive and future-ready digital ecosystem.

Vodacom remains firmly committed to fostering constructive engagement and collaboration in support of South Africa's national development objectives