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**DIGITAL TECHNOLOGY
FOR THE NEXT GENERATION**

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Public Consultation – Comments on the Second Draft National Radio Frequency Plan 2025

Submitted by: BluLemon (Pty) Ltd – ECNS Licence Holder

Date: 11 December 2025

Attention:

Attention:
Mr Davis Kgosimolao Moshweunyane
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and
Mr Manyaapelo Richard Makgotlho
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Dear Gentlemen,

BluLemon welcomes the Second Draft National Radio Frequency Plan 2025 and thanks ICASA for the constructive consideration of our May 2025 submission. We are pleased to note that the list of acronyms has been updated, and editorial corrections have been implemented,

DRM is now appropriately referenced in the MF and FM (Band II) sections, fully aligning the Plan with South Africa's established current dual-standard (DAB+ and DRM) policy framework.

Regarding VHF Band III (174–240 MHz), we fully understand and strongly support ICASA's decision to first conduct a structured study to "identify the highest-value uses of the band and develop an

RFSAP". This measured, evidence-based approach is exactly what is needed to determine the optimal mix of DAB+ and DRM services for national, regional and community coverage.

BluLemon, as the technical enabler of South Africa's first DRM+ trial and an experienced ECNS licensee, is delighted to place itself at the forefront of this important exercise. We stand ready to contribute expertise, trial data, international benchmarks and technical support to ensure the study delivers the most future-proof and inclusive outcome for digital radio in South Africa.

In the interim, and without prejudging the outcome of the study or creating any regulatory obligation, we respectfully suggest that DRM+ in Band III be listed alongside DAB+ as a recognized typical application. Such a neutral, forward-looking reference would simply acknowledge the existing ITU-standardized option, preserve maximum flexibility for the future, and align the NRFP with the technology-neutral spirit already achieved in the other broadcasting bands.

Thank you once again for the open and progressive consultation process.

Yours sincerely,

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