



CITY OF CAPE TOWN  
ISIXEKO SASEKAPA  
STAD KAAPSTAD

**Attention:**

Mr Manyapelo Richard Makgotlho

ICASA

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Delivered by email

**Response to "DRAFT RADIO FREQUENCY SPECTRUM ASSIGNMENT PLAN FOR THE FREQUENCY BAND 380 TO 400 MHz"**

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| Submitted by:     | City Telecoms<br><br>Information Systems & Technology Directorate<br>City of Cape Town |
| Date:             | 15 November 2017   |
| Prepared by:      | Thomas Bosman, Dr Raven Naidoo, Mark Neville   |
| Respond to:       | Thomas Bosman  |
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## Introduction

The City of Cape Town (“the City”) welcomes ICASA’s plans for the rationalisation of spectrum assignment and policy clarity on the way forward. The City has previously given input and comments to the draft ICASA proposals with regard to the IMT bands.

The Telecommunications Department of the City of Cape Town (“City Telecoms”) welcomes any measures to manage the availability of spectrum for public protection and disaster response (PPDR) purposes. We therefore broadly support the intentions as laid out in the latest set of *Draft radio frequency spectrum assignment plan for the frequency band 380 to 400 Mhz*.

The City of Cape Town is building a metropolitan telecommunication broadband network covering the entire metro area, with network and/or Internet access for all its users/employees and connectivity for all municipal devices and systems. In addition, the City has a mandate to use its network for enabling socio-economic development by facilitating public Internet access and by selling spare infrastructure capacity on its network.

Currently the City also owns and operates its own wireless Private Mobile Radio network that uses TETRA technology, that is used primarily for secure voice communications (although there are some data applications as well) by Safety and Security field staff.

As City Telecoms implements the City’s vision of becoming a “well run, enterprising and connected City” (from the City’s IDP), the management of ‘large urban systems’ will become increasingly dependant on a safe and secure public protection and disaster response network.

These needs have been identified as:

### ***Safety and Security:***

The City requires a secure private wireless mobile network for public safety, which can carry voice and data applications for real time decision-making. Mobility of the users and service area coverage are the key requirements for such a network.

Allocation of spectrum for PPDR should therefore take full account of these municipal requirements, rather than be driven by the needs of one particular set of client’s viz. commercial networks operators. The current set of regulations is focussed on spectrum that has historically been used by the national SAPS and ignores the need for PPDR networks at municipal level.

## Comments on Spectrum Assignment Plans

The proposed Spectrum Assignment Plan do not deal adequately with the issues that are contained within the National Broadband Policy pertinent to municipalities.

We are concerned that the policy proposals are counterproductive because they assign PPDR to the 380 – 400 MHz range and ignore municipal PPDR currently operating in the 410 – 423MHz range

The City’s view on the above is underpinned by the lack of proposed allocation of frequency spectrum for municipal PPDR use. The City’s need for spectrum allocated for its use by a range of departments and applications has been outlined above.

Our key concern with the ICASA spectrum allocation plans is the lack of clarity as to whether the City will be required to migrate its TETRA system from its current spectrum allocation in the 410 – 423MHz range to the sub 400 MHz range

The City already has licensed use of spectrum in the 410-423MHz range for its TETRA network, which is used for a public safety voice network. There is a need for additional spectrum for the creation of a mobile Public Safety Data Network i.e. one in which the data capabilities of the TETRA system can be utilised. ICASA’s spectrum allocation should make specific provision to set aside suitable frequency ranges for this purpose by municipalities. There is currently no PPDR

allocation for data intensive applications in the IMT450 or IMT700-850 range. By proposing to move SAPS and municipalities down to the sub-400MHz range, ICASA is effectively forcing public safety networks to be only capable of low data rate communications. High data rates will only be available from commercial service providers, but commercial networks cannot provide the security and guarantee of service quality required for disaster management or support for emergency services. As importantly, the City will have to repurpose and re-capitalise the entire network infrastructure to accommodate the new frequency assignment – at some considerable cost and with major disruption to the existing PPDR operational activity.

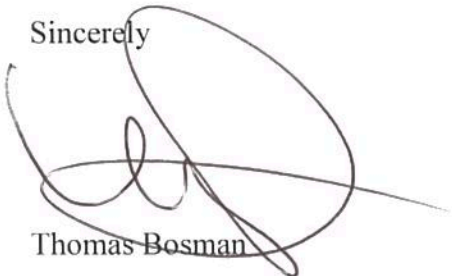
**We therefore propose that ICASA honour the grandfather spectrum allocation to the City in the 410 – 413MHz range.**

**Secondly, the City also proposes that ICASA allocates portions of the IMT700-850 range to PPDR to enable data-intensive PPDR applications.**

The City supports the general approach of ICASA to allocate spectrum to categories of use, rather than particular applications (e.g. LTE, Smart Grid, etc.). In our view it would not be correct to impose applications to particular spectrum bands, as the changes in technology and usage will undoubtedly impose unforeseen limitations in the future.

The City will support all other public sector bodies (ESKOM, TRANSNET, municipalities, etc.) in a motivation for a set-aside of frequency to public sector entities that can be used generally for PPDR applications. The City will also raise its concerns through the South African Local Government Association (SALGA)

Sincerely

A handwritten signature in dark ink, appearing to be 'Thomas Bosman', written over a horizontal line.

Thomas Bosman

Manager: Telecommunications

END

