



Cyberdine Secure Internet (Pty) Limited

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FAO Mr. Mandla Mchunu – Project Manager
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SOUTH AFRICA

23 June, 2026

Cyberdine response to ICASA consultation on draft amendment of the Radio Frequency Spectrum Regulations, 2015

Dear Mr. Mchunu,

I am pleased to send you the following response to ICASA's consultation on the draft amendment of the Radio Frequency Spectrum Regulations on behalf of Cyberdine Secure Internet.

Cyberdine is part of the Avanti Group of companies, a Ka-Band satellite operator that provides satellite capacity where and when required. Cyberdine has a long-established presence in South Africa and sells Ka-Band (29.5 – 30 GHz / 19.7 – 20.2 GHz) capacity from its highly capable Hylas 4 satellite across the continent of Africa.

Cyberdine also holds Individual licences for Electronic Communications Networks and Electronic Communications Network Services, enabling it to operate a state-of-the-art gateway in Johannesburg, which has recently been upgraded. This facility provides robust backhaul connectivity, supporting MNOs and other operators to their remote sites throughout the region and enhancing connectivity for millions of underserved South Africans.

Cyberdine, and the Avanti Group in general, broadly welcomes the proposed amendments to the Radio Frequency Spectrum Regulations, 2015.

In particular, it commends the following proposals:

- Improving the clarity of the regulatory framework with respect to Earth Stations In Motion. In particular, Cyberdine welcomes ICASA's approach to keep its proposals in line with the relevant Resolutions, Regulations, Reports and Recommendations of the ITU-R.
- Confirming that foreign ESIMs are exempt from licensing in South Africa as long as they are in the territory for 90 days or less. This reflects international best practice.
- Establishing a space registration framework that is **not** associated with fees. These measures comprise a pragmatic and reasonable approach to allow rapid resolution of technical issues without creating a burden to enter the market that would have disincentivized further network deployments
- Inclusion of the Ka-Band in Annexure Ka-band. These frequencies are essential for current and future high bandwidth services.





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As a practical matter, Cyberdine respectfully suggests that the lawful interception capabilities would more appropriately fall on the Earth Station operator. This is because some satellite space segment operators may not have a physical presence in South Africa to facilitate lawful interception. Additionally, as a minor suggestion, the reference to Resolution 156 (WRC-15) could be updated to Resolution 156 (WRC-23).

Again, Cyberdine commends ICASA for its work in improving the regulatory framework and is available if ICASA has any questions.

Kind Regards,

Asbjorn Christoffersen
Head of Regulatory Affairs