



ICASA

Mr Davis Kgosimolao Moshweunyane

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Public Consultations of the Draft National Radio Frequency Plan 2025

Dear Mr. Moshweunyane

BluLemon is an ECNS license holder and a technical enabler of South Africa's first DRM+ trial. As a company committed to innovation and inclusive digital transformation, we welcome the opportunity to comment on the Draft National Radio Frequency Plan 2025 and support ICASA's ongoing efforts to ensure efficient and future-ready spectrum management.

We respectfully note a few areas in the current draft that may benefit from clarification or alignment with existing South African policy and regulation:

- The **Acronyms section** currently omits *DRM (Digital Radio Mondiale)* and *DSB (Digital Sound Broadcasting)*, even though both are explicitly recognized in ICASA's own regulations and in the Ministerial Policy Directive on Digital Sound Broadcasting, whilst T-DAB and S-DAB are mentioned.
- There is **no reference to DRM in the FM Band (Band II) or the AM Bands**, despite DRM being one of the two officially designated digital radio standards in South Africa. These omissions could lead to confusion or inconsistency in implementation.

- We also propose **consideration of including DRM as a potential technology in Band III**, following the example of Indonesia. While not mandatory, this would offer additional flexibility within the already recognized policy framework.

Furthermore, we suggest a minor editorial correction on **page 4-37**, where the frequency range “2325–405 kHz” appears to be a typographical error. We believe the intended range is “**325–405 kHz**.”

We understand that the Radio Frequency Plan is a technical document and not a policy setting instrument. However, it plays a key role in guiding implementation. To that end, ensuring alignment with South Africa’s established DSB framework—where both DRM and DAB+ are recognized—would help streamline deployment, foster investment, and avoid ambiguity.

We appreciate ICASA’s transparent and consultative approach and remain available to support this process in any technical or collaborative capacity.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Russel Jones', with a stylized flourish at the end.

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