

The Chairperson
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Attention:

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Comments on the Second Draft National Radio Frequency Plan (NRFP-2025)

Dear Chairperson

1. Introduction

The DRM Southern Africa Group (“DRM SA”) and the Consortium appreciate the opportunity to provide comments on the Second Draft National Radio Frequency Plan (NRFP-2025). We would like to express our sincere thanks to the Authority for the constructive and meaningful incorporation of the majority of our submissions made on the First Draft. The revisions introduced in the Second Draft significantly strengthen South Africa’s digital sound broadcasting framework and align well with international best practice.

We also **confirm** that we would like to **make oral representations** during the public hearings to be held by the Authority in January 2026.

2. Appreciation for ICASA’s Incorporation of Key Inputs

2.1. We wish to formally thank the Authority for adopting a substantial portion of the recommendations contained in our previous submission. In particular, we welcome:

- The inclusion of the DRM, DRM30, DRM+ and DSB definitions in the Acronyms and Terminology section
- Explicit recognition of DRM30 within the Medium Wave band
- Explicit recognition of DRM+ within the FM band (87.5–108 MHz)

- Application of updated ITU-R standards referencing DRM use cases and performance characteristics

2.2. These changes represent an important step toward modernising South Africa's sound broadcasting framework, aligning national policy with international norms, and enabling future digital migration strategies.

3. Clarification on DRM Terminology: DRM, DRM30 and DRM+

3.1. DRM SA wishes to acknowledge the Authority's use of the terms **DRM30** and **DRM+** in the Second Draft. These terms remain useful in the regulatory and planning context, as they denote the **operational modes of the single DRM Standard**, depending on the frequency band in which the system is deployed:

- **DRM30:** DRM operating below 30 MHz (LW, MW, SW)
- **DRM+:** DRM operating in the VHF band (especially 87.5–108 MHz)

3.2. We would like to reaffirm that:

DRM remains one international broadcasting standard as defined by ITU-R, with two operational configurations for different frequency ranges. The underlying technical specification, codecs, service features and compliance framework remain unified and interoperable.

We welcome ICASA's continued use of these terms in a practical spectrum-management context.

4. ICASA's Position on the Longwave (LW) Band

4.1. DRM SA acknowledges ICASA's decision **not to mention DRM for the Longwave portions of the LF band (148.5–255 kHz and 255–283.5 kHz)** in the Second Draft of the NRFP.

4.2. We understand the possible reasoning implied by the current international and technical realities, including:

- The global decline in LW broadcasting usage
- The fact that Long Wave has almost never been considered for broadcasting in the past
- High infrastructure and antenna requirements at these frequencies.

4.3. However, DRM SA respectfully submits that the specific propagation characteristics of long wave, particularly its outstanding performance over sea water, remain highly valuable in the digital era. With DRM30, the band becomes uniquely suitable for future maritime safety-of-life services, including digital voice broadcasting, automated weather warnings, NAVDAT messaging and the transmission of graphical products such as sea-state charts, services that can be provided far more economically on long wave than on MF or HF. Given the rare opportunity this NRFP revision presents to bring South Africa's frequency plan in line with modern digital broadcasting technologies, we kindly request ICASA to include "Digital Sound Broadcasting (DRM)" as a recognised application in the long-wave broadcasting allocations (148.5–255 kHz and 255–283.5 kHz).

5. Support for ICASA's Direction on VHF Band III

- 5.1. DRM SA welcomes that the Second Draft of the NRFP 2025 includes Digital Sound Broadcasting in VHF Band III (174–234 MHz) and notes that it currently names only DAB+ explicitly, while DRM – the other internationally standardised DSB system in Band III – is not mentioned.
- 5.2. We respectfully submit that the National Radio Frequency Plan, as a long-term and rarely revised instrument, should remain fully technology-open and future-proof. Technical regulations can be updated comparatively quickly, whereas the NRFP sets the framework for decades. It is therefore important that both ITU-recognised digital sound broadcasting standards – DAB and DRM – are expressly recognised in Band III
- 5.3. This forward-looking approach has recently been taken by **Indonesia**, the first country worldwide to adopt a genuine dual-standard strategy: its current frequency plan explicitly allocates VHF Band III to Digital Sound Broadcasting using both DAB+ and DRM, thereby ensuring maximum flexibility for national, regional and local services without prejudging future deployment choices.
- 5.4. To this end, we continue to **welcome and encourage ICASA to conduct a structured study** to:
 - Identify the highest-value national uses of VHF Band III
 - Assess international DSB deployment models, including DRM and DAB
 - Examine technical coexistence, propagation and sharing considerations
- 5.5. DRM SA and the Consortium express their continued willingness to:
 - Contribute technical and regulatory research from global DRM deployments
 - Provide access to international DRM experts
 - Support local technical analyses, receiver ecosystem studies, and industry workshops
 - Ensure the Authority is furnished with latest ITU-R material, case studies, and real-world deployment evidence
 - Explicit recognition of both standards in the NRFP would significantly strengthen South Africa's long-term digital broadcasting strategy and align it with emerging global best practice.

6. FM Band (87.5–108 MHz) – DRM+ Readiness

- 6.1. DRM SA welcomes the recognition of DRM+ technical viability in the FM band by mentioning the SA DRM+ FM-Band Trials.
- 6.2. Beyond the successful South African trial, DRM+ is a mature, ITU-standardised technology operating at low and high-power levels in countries including India, Indonesia, Brazil, Pakistan, Russia, Germany and France – with proven safe coexistence with analogue FM and full protection of the aeronautical band 108–117.975 MHz.
- 6.3. We encourage ICASA to reflect this extensive real-world evidence in the final NRFP, confirming DRM+ as a fully deployable digital radio option for South Africa.

7. Conclusion

DRM SA remains committed to supporting ICASA in the advancement of a technologically neutral, future-proof, and internationally aligned broadcasting spectrum framework. We appreciate the constructive engagement reflected in the Second Draft and look forward to continuing our collaboration during the development of the Final NRFP.

We remain at the Authority's disposal for any further technical input, clarification, or participation in working groups and studies that ICASA may undertake.

Sincerely,



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Chairperson

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