
CONSULTATION ON THE PROPOSED NEW LICENSING FRAMEWORK FOR SATELLITE SERVICES

COMMENTS BY ESKOM

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COMMENTS BY ESKOM ON THE
Consultation on the Proposed New Licensing
Framework for Satellite Services

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1. INTRODUCTION

Eskom appreciates the opportunity to provide input into the Consultation on the Proposed New Licensing Framework for Satellite Services.

Eskom is a holder of a PECN (Private Electronic Communications Network) Licence Exemption issued by the Independent Communications Authority of South Africa (ICASA). The communications network is used to provide communications services related to Electricity Supply Industry (including generation, transmission, distribution, system operations and support services). Satellite services are a part of communication services that Eskom has access to.

2. GENERAL COMMENTS

Eskom supports the government in its objective to determine satellite regulatory framework; satellite service provisioning procedures; authorisation of several types of terminals; procedures for registration of international satellite operators and its objective to consider the need to review spectrum fees due to increasing amount of bandwidth used on higher frequencies.

3. SPECIFIC COMMENTS

Clause 1: *No Comments*

Clause 2: *No Comments*

Clause 3: *No Comments*

Clause 4: QUESTION 1: *No Comments*

Clause 5: Table of Frequencies

Eskom is currently using the following channels on an Ad Hoc basis, issued by ICASA, and therefore will be affected:

Ch 17	Tx 155,5875 MHz	Rx 148,5375 MHz	B/W 12.5 kHz
Ch 21	Tx 155,8875 MHz	Rx 148,8375 MHz	B/W 12.5 kHz

Clause 5: QUESTION 2: *No Comments*

Clause 6: QUESTION 3: Separate licence/authorisation

Comment/question - For an earth station owner for a private network, do user-terminals need licensing ?

Clause 7: QUESTION 4: *Could the 5 year limit be increased to 10 years?*

Clause 8: QUESTION 5: *No Comments*

Clause 9: QUESTION 6: *No Comments*

Clause 9: QUESTION 7: *No Comments*

Clause 10: QUESTION 8: *No Comments*

Clause 11: QUESTION 9: Proposals:

Eskom proposes the following to be considered:

- Emergency Preparedness for Eskom includes satellite communications.
- Satellite services help to close the gap where there is no coverage in remote areas for Eskom.
- National Operations need to accommodate the following:
 - Rapid adoption of utility scale renewables.
 - “Behind the meter” PV, unpredictable demand and network complexity.
 - Baseload uncertainty leading to load shedding.
 - Grid collapse (Black Out):
 - Loss of communication channels, some with immediate effect, with all communications gone within 72 hours after Black Out.
 - High likelihood of social instability, descending into general anarchy
 - Grid Restoration (Black Start):
 - Could take several weeks, depending on state of power stations, the network and availability of technical support services.
 - As a minimum, Black Start requires Communication and Co-Ordination.

LEO (Low Earth Orbit) services are transforming the world in many ways:

- Overcoming Geographical Barriers:
LEO satellite-based internet services address geographical challenges, with high-speed internet directly to remote locations and most isolated regions of rural South Africa.
- Enriching Education and Learning:
Providing students and teachers with reliable internet access transforms education in rural South Africa.
- Unleashing Economic Potential:
Reliable internet connectivity stimulates economic growth and development in rural communities, creating job opportunities, bridging the urban-rural economic gap.

4. CONCLUSION

Satellite services are important to South Africa's economic growth and stability, therefore proper licencing frameworks are crucial for the services aims.

Eskom would like to extend its appreciation to ICASA for the opportunity to participate in this Consultation. We trust that our comments have been constructive and that they are of assistance in finalising the Framework. In the event that further clarification or information is required, Eskom would be more than happy to provide same.