

Independent Communications Authority of South Africa
350 Witch-Hazel Avenue, Eco Point Office Park
Eco Park, Centurion
South Africa
Private Bag X10,
Highveld Park 0169
Centurion, Pretoria

Friday, 11 February 2022

Attention: Mr. Manyapelo Richard Makgotlho
rmakgotlho@icasa.org.za

Eutelsat's comments on the Draft Implementation of the Radio Frequency Migration Plan and the International Mobile Telecommunications Roadmap

Dear Sir,

Eutelsat, one of the world's leading satellite operators, would like to thank the Independent Communications Authority of South Africa ("ICASA") for publishing and opening for comments the Draft Implementation of the Radio Frequency Migration Plan and the International Mobile Telecommunications Roadmap ("Implementation Plan"). Eutelsat welcomes this opportunity to express its views on the proposed document.

Eutelsat appreciates that ICASA has not included for now in the Implementation Plan frequency bands allocated to the fixed satellite service ("FSS"). Eutelsat in fact encourages the deployment of mobile broadband services in bands identified for IMT that are outside of FSS allocation, because of the difficult co-frequency sharing between IMT and satellite services. In the mid-bands for instance, Eutelsat supports the deployment of terrestrial 5G in the 2300-2400 MHz and 3300-3400 MHz frequency bands, identified for IMT and studied by ICASA in the Implementation Plan.

Eutelsat would however like to express its concerns over the bands mentioned in the findings in respect of the Inquiry of 30 September 2021. Indeed, some of the bands of interest from this Inquiry are currently used or are planned to be used in the future for FSS.

Eutelsat would like to take this opportunity to highlight the crucial role satellites play in connecting people everywhere and supporting the socio-economic development of many countries. Among other benefits,

T +33 1 53 98 47 47
F +33 1 53 98 37 00
www.eutelsat.com

Headquarters
32 Boulevard Gallieni
92130 Issy-les-Moulineaux
France

Eutelsat S.A. Société anonyme
au capital de 658 555 372,80 €
422 551 176 RCS Paris

satellites present a cost-effective solution for tackling the digital divide by providing broadband access directly to remote and hard to reach areas and by helping expand the coverage of mobile networks to places that would not otherwise be covered.

More specifically, Eutelsat would like to stress the importance of the C-band (3.4-4.2 GHz, 4.5-4.8 GHz downlink, and 5725-7075 MHz uplink) and Q and V bands (37.5-42.5 GHz downlink, 42.5-43.5, 47.2-50.2 and 50.4-52.4 GHz uplink) for current and future satellite services, which overlap with the bands n° 21, 22, 25, 27, 49, 50, 51 and 52 of the Inquiry.

The C-band is fundamental with its unique characteristics such as ubiquitous coverage and rain resilience. This band has been used for decades by satellites to provide data connectivity and video services, and satellite operators and their users rely heavily on services using these frequencies. Significant investments have been made to launch and develop C-band satellite services to provide reliable, resilient, and secure communications services.

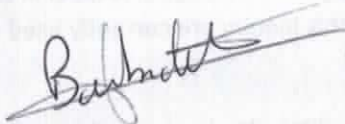
The Q and V bands are key for the future of satellite services, by enabling access to wide bandwidths for the gateways of the forthcoming generation of high and very high throughput satellites, and for user terminals in a future step. The satellite industry is investing significantly in this band to provide in the foreseeable future high speed connectivity services everywhere.

In view of the importance of the above-mentioned bands for satellite operations and the importance of satellite services for worldwide connectivity, Eutelsat would like to highlight the need to ensure that these bands continue to be available for essential satellite services in South Africa.

Eutelsat therefore invites ICASA to take into account the spectrum needs for satellite services and the protection of these services from interference when identifying frequency bands for IMT.

Eutelsat hopes ICASA will consider the above elements and looks forward to seeing the conclusions of this consultation. Eutelsat remains at ICASA's disposal for further questions on this contribution.

Respectfully submitted,



Fabrice Barbedette

Director of Regulatory Market Access

Eutelsat S.A.

32 boulevard Gallieni, 92130 Issy-les-Moulineaux, France