



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, 27 August 2021

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

Dear Sir,

Eutelsat's comments on the Draft Update of the National Radio Frequency Plan 2021

Eutelsat S.A., 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 Update of the National Radio Frequency Plan 2021. Eutelsat welcomes this opportunity to express its views on the proposed document.

Eutelsat supports the update of the National Radio Frequency Plan to reflect the resolutions taken at the World Radiocommunication Conference 2019 (WRC-19).

Eutelsat was nonetheless surprised to see that International Mobile Telecommunications (IMT) are among the typical applications of the 4500-4800 MHz frequency band in ICASA's Draft National Radio Frequency Plan. This band has indeed not been identified for IMT by the International Telecommunications Union (ITU). The adjacent 4800-4990 MHz band has however been identified for IMT use at WRC-19 and the Draft National Radio Frequency Plan mentions IMT as a typical application in part of this band (4825-4990 MHz). Eutelsat would welcome clarifications as to why a reference to IMT applications is made in the 4500-4800 MHz band.

The 4500-4800 MHz band is allocated on a primary basis to Fixed Satellite Services (FSS). The use of this band for FSS, in accordance with Appendix 30B of ITU's Radio Regulations, guarantees an equitable access to the geostationary orbit for all countries. If IMT were introduced in this band, the resulting interferences would threaten connectivity and video services provided by satellites, unless very strong constraints are imposed on both IMT base stations and FSS earth stations.

Because co-frequency sharing between IMT and FSS is almost unfeasible, to protect essential satellite services in the 4500-4800 MHz band, and to remain consistent with ITU regulations, Eutelsat believes IMT should not be allowed to enter this band. Eutelsat would suggest deleting the mention of IMT in the typical applications of the 4500-4800 MHz band in the National Radio Frequency Plan.

Eutelsat hopes ICASA will consider the suggestion and looks forward to reading the final version of South Africa's National Radio Frequency Plan 2021.



If you have any questions, please contact:

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'A. Guerin', enclosed within a large, loopy oval shape.

Alexandre Guerin
Director of Regulatory and Spectrum Affairs
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