The Independent Communications Authority of South Africa
The Chairperson, Mothibi G. Ramusi
350 Witch-Hazel Ave
Eco-Park Estate
Centurion, 0144

For the attention of: Ms Pumla Ntshalintshali

Per email: pntshalintshali@icasa.org.za / rmakgotlho@icasa.org.za

30 May 2025

Dear Chairperson

DRAFT REGULATIONS ON DYNAMIC SPECTRUM ACCESS AND OPPORTUNISTIC SPECTRUM MANAGEMENT IN THE INNOVATION SPECTRUM FREQUENCY RANGES 3800 - 4200 MHZ AND 5925 – 6425 MHZ

1.) GLOBECAST AFRICA is one of South Africa's leading broadcast service suppliers supporting all broadcasters with transmission requirements including but not limited to E-TV, Multichoice and the SABC. Globecast welcomes the invitation by the Authority to make written representations on the Draft Regulations on Dynamic Spectrum Access and Opportunistic Spectrum Management (DSA).

2.) In the interests to our business we hereby respond to the publication by the Independent Communications Authority of South Africa (the Authority) for public consultation of the Draft Regulations on Dynamic Spectrum Access and Opportunistic Spectrum Management (DSA) in the Innovation Spectrum Frequency Ranges 3800 - 4200 MHz and 5925 – 6425 MHz on 28 March 2025 in the Government Gazette No. 52415, Notice 6066 of 2025 (the Draft Regulations on DSA).

3.) We have certain concerns with the draft regulations that we would like to address these been notably as follows:

a. **Interference: C-Band Receive Band between 3800 to 4200MHz**
It is within this band that most of the required incoming feeds are due to be received for commercial use by our broadcasters by having us receive these feeds (whether news, sports or events) and by our findings are subjected to 5G interference. This interference has been reported to ICASA and upon inspection we find one usually cannot identify the source of the interference nor believe when measuring these 5G power levels are the correct and safe levels. They actually exceed the ability of the receiver's filtering circuits to negate the high

signals causing signal harm by affecting our ability to lock onto these receive frequencies and on-passing clean feeds. Even when installing bandpass filters and 5G Hardened LNBs, we still experience loss and that is because the maximum permitted transmit power levels are not enforced nor respected by operators.

b. **Referring to Summary Results and Simulations and Trials** – A1.5 Validation of the findings from Monte Carlo Simulations:
    i. The graphs submitted cannot be read nor understood; we thus assume that the data is questionable and that actual real-world transmitting power to be different to what the CSIR has shown.
    ii. One cannot verify the data/ graphs presented as they are illegible and the data indicated presumed questionable.

c. **Scenario A1.4b**: **The simulation table A1.4B**
    i. The table used in scenario 2 is wrong. The Azimuth cannot be 113 degrees for Randburg as the actual location of any satellite at this point is below the Horizon.
    ii. For Randburg: The satellite look angle at 43deg is between IS39 and KazSat3 so not sure what measurement referencing was used here to validate the results shared.

4.) The Authority puts a lot of weight on the results from simulations and uses this as a sole basis to go ahead with draft regulations. It is thus imperative for the Authority to have the findings peer reviewed for accuracy and purpose.

5.) We recommend the Authority to be vigilant when finalising the Draft Regulations on DSA as we feel there is still a lot of testing to take place at credible facilities (including at Globecast) to gather accurate data and help improve and add value to the data capturing.

6.) We look forward to engaging further on the issues raised through public hearing and Globecast as always is available to assist ICASA in its research.

Thank you for the opportunity to respond
Yours Sincerely

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30th May 2025