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**The Independent Communications Authority of South Africa
(ICASA)**

350 Witch-Hazel Avenue, Eco Point Office Park
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Attention:

Ms Pumla Ntshalintshali

Email: DSA2023@icasa.org.za

Cc: PNtshalintshali@icasa.org.za and rmakgotlho@icasa.org.za

13 June 2025

Re: Response to ICASA's Draft Dynamic Spectrum Access 2025

Dear Ms Ntshalintshali,

Huawei would like to thank ICASA for the opportunity provided to the company to comment on the Draft Dynamic Spectrum Access 2025, published in the Government Gazette No. 52415 dated 28 March 2025.

Huawei is the leading supplier of infrastructure equipment for the telecommunications industry globally and in South Africa, as well as being a major manufacturer of mobile handsets and other electronic consumer goods.

Huawei welcomes the opportunity to submit the following comments for your consideration and requests the opportunity to make an oral presentation. Please feel free to contact us if you have any questions or require any further clarification.

Yours sincerely,

Mr. Musa Ngobeni

13 June 2025

Date

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Comments from Huawei on ICASA's Draft Dynamic Spectrum Access 2025

Huawei fully supports ICASA's proactive initiative in developing a comprehensive database to manage systems operating in the 3800–4200 MHz and 5925–6425 MHz bands, which are supported by stakeholder engagement, publication of findings, and urban simulation studies that are crucial in a quest to balance a robust innovation with the protection of incumbent services, while aligning with globally recognized best practices.

1. Comments on the 3800–4200 MHz Band

- A. Spectrum Allocation and Incumbent Protection:** With the proactive steps that ICASA has taken for the benefits of the industry and the consumer at large, Huawei acknowledge the best work that was done on the ground, while also noting that there is potential for International Mobile Telecommunications (IMT) evolution in this band, it is noteworthy that neither the International Telecommunication Union (ITU) nor the African Telecommunications Union (ATU) formally identifies the 3800–4200 MHz band for IMT applications. In Africa and particularly in South Africa the priority at the moment is to safeguard Fixed Satellite Service (FSS) operations. According to the draft regulations, over 300 FSS earth stations are concentrated in Gauteng, underscoring the imperative to protect these static installations. This high density of incumbents inherently limits the feasibility of deploying macrocell IMT networks.
- B. Regulatory Efficiency and International Best Practices:** Huawei supports ICASA's proposal for low/medium power local area networks in the areas with pronounced FSS presence. However, the suggestion to implement a dynamic spectrum database (similar to TV white spaces) for interference management introduces unnecessary complexity. Given that FSS earth stations operate under fixed parameters, international experience exemplified by the CEPT ECC Decision (24)01¹ demonstrates that a manual, regulator-driven approach can reliably calculate site specific frequency and power parameters without the administrative burden of real-time management. Moreover, while significant spectrum is needed for next-generation networks, it is prudent to also consider alternate bands (such as 4.8 GHz or 6 GHz) to better meet IMT spectrum demands.

2. Comments on the 5925–6425 MHz (L6G) Band

- A. Maintaining the Low-Power Regime:** Huawei supports preserving the current role of the L6G band for low-power, indoor Radio Local Area Network (RLAN) use model that has shown success both in international markets and in Africa. These recommendations are bolstered by ATU Recommendation 005² which stress low-power indoor operation to minimize interference risks while promoting wireless innovation.
- B. Risks of Dynamic Spectrum Sharing:** With the field data and regulatory studies that have been undertaken by ICASA, it shows that introducing the dynamic spectrum sharing in this

¹<https://docdb.cept.org/download/4628>

² <https://drive.google.com/file/d/1JZVhiE2taV-zk-Rr37Ra9D5bLu3d7GnQ/view>

band could create interference risks for thousands of existing microwave links and potentially distort market dynamics consequently, Huawei advocates for retaining the controlled low-power RLAN framework in L6G and strongly opposes expansive dynamic spectrum access regimes in this band.

3. Concluding Remarks

Huawei respectfully proposes a dual-model strategy to cultivate a dynamic yet secure spectrum environment in South Africa:

- **For the 3800–4200 MHz band:** Proposal to adopt a geographically adaptive approach. In areas with limited FSS activity, allocating spectrum to support IMT evolution may be feasible. In incumbent-rich zones (e.g., metropolitan regions like Gauteng), low/medium power local area networks could be deployed without the encumbrance of a dynamic database by following the well-established CEPT ECC Decision (24)01 to ensure robust protection of FSS operations.
- **For the 5925–6425 MHz band:** Maintaining the current allocation for low-power indoor RLANs, in line with ATU Recommendation 005. This measure will safeguard critical microwave links and avert potential interference issues that could arise from a shift toward dynamic spectrum sharing.