

**13 June 2025****The Chief Executive Officer**

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**Attention:** Mr Davis Kgosimolao Moshweunyane

Re: The Draft National Radio Frequency Plan 2025

The GSMA appreciates the opportunity to provide feedback on the ICASA's Draft National Radio Frequency Plan 2025, which is currently under public consultation.

We commend ICASA for the initiative to develop this crucial document. The principles underpinning align with international best practices and demonstrate a commitment to fostering a conducive environment for telecommunications development in South Africa.

After reviewing the document, we noticed multiple structural issues that may require further attention. We have highlighted these in a band-by-band breakdown below.

Given the significance in guiding the future of mobile telecommunications in South Africa, it is essential that the document is clear, concise, and accurate. In its current state, this may not fully meet these criteria and may not adequately serve the purpose of its publication.

As we look forward to the opportunity to further contribute to the progress of this consultation, please be assured of our highest regard.

Yours sincerely,



**Angela Wamola**  
**Head of Sub-Saharan Africa**

**700 MHz, 750 MHz and 600 MHz Band**

The 700 MHz band is of critical importance for mobile broadband and must be managed with precision to ensure continued effectiveness and minimal disruption to existing services and a partial assignment has already happened in South Africa.

The recent inclusion of High-Altitude IMT Base Stations (HIBS), as per WRC-23 decisions, requires careful and coordinated implementation. Regulatory procedures and technical guidelines should be established to ensure that HIBS operations do not interfere with existing terrestrial IMT deployments.

Currently, the draft NRFP-25 permits HIBS on a secondary basis, but there is no technical framework in place to safeguard primary users. It is recommended that ICASA conduct a public consultation or feasibility study to determine coexistence strategies for HIBS and terrestrial IMT systems.

Furthermore, references to Public Protection and Disaster Relief (PPDR) in these bands should be removed. The IMT700 band is already licensed and clear and IMT750 is soon to be licensed, leaving no room for PPDR applications. Likewise, notes regarding the migration of analogue television services should be deleted, as migration above 694 MHz has already been completed. The continued presence of fixed links in this band also contradicts the RFSAP's stated intention for exclusive IMT use.

Additionally, 600 MHz has not been added to the document. The 600 MHz band remains a valuable spectrum asset in the longer-term evolution of mobile broadband services, particularly in regions with wide-area rural coverage needs.

While the band has not yet been made available for IMT use in most African administrations, including South Africa, it is important for ICASA to begin evaluating its potential through national studies and stakeholder engagement. Given the increasing global momentum around repurposing the 600 MHz band, especially in the Americas and in the Middle East, South Africa should consider conducting a feasibility assessment on the reallocation of this spectrum for mobile broadband in the future.

A clear policy position to acknowledge its mid-term potential, would support national spectrum planning continuity and encourage dialogue with regional and global stakeholders.

**850 MHz and 900 MHz Bands**

The 850 MHz and 900 MHz bands are transitioning from legacy applications to modern mobile broadband use. The IMT850 RFSAP was officially repealed on 1 April 2024, as evidenced by the migration of operators such as Liquid into the 900 MHz band.

Therefore, any references to IMT850 RFSAP should be eliminated. The concerns raised for the 700 MHz band, regarding HIBS, fixed links, and television migration, also apply here and should be addressed consistently.

Additionally, the draft plan retains references to the Frequency Migration Plan (FMP) within the 890-942 MHz range. However, it is unclear whether this is a legacy reference related to the concluded 850 MHz migration or if it pertains to a new context. Given that the FMP is being revised in parallel with the Band Plan, alignment between the two documents is essential to avoid confusion and ensure regulatory consistency.

### **1500 MHz Band**

The 1500 MHz band is intended for exclusive IMT use and is slated for licensing or auction in the upcoming assignments, in accordance with the IMT1500 RFSAP. Nevertheless, the draft still retains parts of the band for broadcasting and broadcasting satellite services (e.g., T-DAB and S-DAB), which are not expected to be deployed in South Africa. These allocations should be reconsidered and possibly removed.

Moreover, the plan identifies parts of the band as being in use by fixed links. However, the current status of these links and their future management remain undefined. There is no indication of whether these fixed links will be migrated before the band is licensed, nor is there any guidance in the FMP on this matter. It is also recommended that ICASA clearly indicate that the full 90 MHz of spectrum from 1427 to 1517 MHz is to be designated for IMT services. The use for either supplemental downlink or TDD should be debated with the MNOs in South Africa before a decision is made, considering the evolving needs and ecosystem developments.

### **1800 MHz and 2.1 GHz Bands**

These bands continue to support a significant portion of South Africa's mobile broadband infrastructure, but the lack of updated RFSAPs has become a concern. We strongly recommend that ICASA develops and publishes RFSAPs for the 1800 MHz and 2100 MHz bands.

These RFSAPs should reflect the latest technological advances and include non-restrictive power limits that are aligned with contemporary network equipment capabilities and technology upgrades.

### **2.6 GHz Band**

South Africa has fully transitioned this band to a TDD-only channelling plan, rendering all legacy references to FDD/TDD arrangements obsolete. These should therefore be removed from the NRFP.

Additionally, suggestions to amend the RFSAP to accommodate IMT-2020 are redundant, as the existing plan already incorporates IMT-2020 provisions. It is advisable for the RFSAP to remain technology-neutral.

### **3.5 GHz MHz Band (3.3-4.2 GHz)**

The 3.5 GHz band is mostly identified for IMT following WRC-23 (3.3-3.8 GHz). However, this band is currently shared with several non-IMT licensees, including fixed satellite services and point-to-point wireless systems. A revised or additional RFSAP for this band is necessary, along with a national migration plan to transition incumbent users to alternative spectrum in parts still non-cleared and not assigned to MNOs.

ICASA should also outline a clear and transparent assignment process for the remaining assignment of this band to IMT services. Migration timelines for non-IMT users and coordination strategies for other licensees must be included to ensure fair access and minimal interference.

Additionally, the overlap with the DSA draft regulations (such as the encouragement to register C-band earth stations) adds to the complexity and should be resolved in parallel. It is also possible that the entire 3300-3800 MHz range is split under Resolution 223 in at least two sub-bands to improve planning flexibility, as different ranges have different challenges.

Additionally, countries are moving beyond 3.8 GHz and planning future availability of the band to cater for a continued data usage growth and 5G growing needs. Looking into the expansion up to 4.2 GHz remains necessary.

### **4800 MHz Band**

The 4800-4990 MHz band has been added as a potential IMT band, but it currently has fixed links and other services, such as OB links and ENG. It is recommended that this band be added to the FMP to guide the phased removal of existing services and support its future use for IMT. An early development of an RFSAP for this band is necessary, which should include technical conditions, channel plans, migration schedules, and synchronization guidelines.

### **Upper 6 GHz Band (6425–7125 MHz)**

The upper 6 GHz band is becoming increasingly relevant for IMT due to global spectrum harmonization efforts. WRC-23 was key for the identification of this band for IMT in Region 1.

India's support for IMT in the upper 6 GHz band was not fully defined at WRC-23, but now that it has been realised, along with other adopters of the 6 GHz band for mobile, countries representing 80% of the global population have now either identified the band for IMT at WRC or supported it locally, including Brazil, that reversed its decision to use the full band for Wi-Fi. We have always believed in the importance of 6 GHz but now developments since WRC-23 indicate that it will provide the definitive ecosystem for connectivity in the 2030s.

Hong Kong and UAE have already assigned the upper 6 GHz band to their mobile operators, with network roll-out expected in the following months. These earlier upper 6 GHz assignments will make use of 5G-Advanced technologies to deliver enhanced capacity and performance. Countries that follow the path taken by Hong Kong and UAE will take a significant step forward in ensuring that mobile underlines their status as prestige business locations.

The GSMA recommends that ICASA develops an RFSAP for the 6425-7125 MHz range to support future mobile broadband use.

### **26 GHz Band**

The 26 GHz band is pivotal for 5G rollouts in high-density urban areas. We support the development of the proposed RFSAP and the inclusion of this band in the updated FMP. Migration of some fixed links is necessary to make room for IMT, and geographic sharing between IMT and fixed services should be encouraged wherever technically feasible.

However, the NRFP-25 does not currently specify commercial availability dates for this band. As such, the GSMA requests that ICASA expedites the publication of a full RFSAP for the 26 GHz band, including all necessary technical and regulatory guidance.

### **40 GHz Band**

This band presents a supplementary opportunity for IMT deployment, with the understanding that it should be secondary to the 26 GHz band. A phased development of an RFSAP for the 37-43.5 GHz range is welcomed but requires caution as the entire band is unlikely to be made available initially. The band could be licensed incrementally based on demand and technical readiness.