Global Policy Partners

Reference: L-BAND/GPP/Follow-up
Date: 23/ 01/ 2026
Attending to this matter: Wydeman Coetzee

To: Mr. Mothibi Ramusi
The Chairperson
Independent Communications Authority of South Africa (ICASA)

Per email: mramusi@icasa.org.za

RE: Supplementary Commentary on the Urgent Call to Cap IMT at 1492 MHz in the Final NRFP 2025 to Protect Safety-of-Life Services

Dear Chairperson,

Global Policy Partners (GPP) writes on behalf of our client, Viasat, to raise continued concern regarding ICASA's *proposed approach to spectrum planning in and around the L-band, as reflected in the Second Draft National* Radio Frequency Plan (NRFP) 2025, and the risk that planning and/or enabling IMT in 1492–1518 MHz would materially undermine the protection of adjacent and incumbent Mobile-Satellite Service (MSS) operations that support safety-of-life and disaster-resilience communications.

ICASA's notice dated 10 November 2025 confirms publication of the Second Draft NRFP 2025 for further written representations, and that public hearings are scheduled for 15–16 January 2026. ICASA further notes that the NRFP update is intended to align with the ITU Radio Regulations (2024 edition) and to support regional harmonisation through the ATU AfriSAP and the SADC Frequency Allocation Plan.[1]

Given the extensive stakeholders' engagement during 2025, including the L-band workshop held in March 2025, and the submission of subsequent industry objection letters, we respectfully request specific clarification on how those inputs have been treated, and we propose follow-up actions to ensure the process remains aligned with:

(i) the technical evidence on coexistence risks; and
(ii) the strong regional consensus recorded later in 2025 within SADC.

1. Background and historical context

Viasat has consistently engaged, both directly and through industry associations, in all pertinent consultations affecting the broader L-band range. Our position is informed by decades of operational and technical work conducted globally and regionally, including within the ITU and CEPT frameworks, recognising that adjacent-band compatibility between terrestrial IMT and MSS terminals is highly sensitive to real-world deployment conditions and receiver performance, and would present persistent interference risk where protections are not explicit, enforceable, and practical.

The concern is particularly acute because 1492-1518 MHz lies immediately below the MSS downlink band, which starts at 1518 MHz. While CEPT ECC Report 263 (2017) is often cited in support of adjacent-band coexistence measures, the record of ICASA's January 2026 NRFP public hearings reinforced that ECC 263

[1] https://www.icasa.org.za/news/2025/icasa-invites-public-comments-on-the-second-draft-national-radio-frequency-plan-2025

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should not be treated as a sufficient or settled technical basis for enabling IMT up to 1518 MHz. Stakeholders highlighted, among other points, that:

(i) ECC 263 relies on narrow modelling assumptions (including scenarios that consider a single IMT base station), which can understate aggregated interference in real multi-operator deployments;
(ii) it does not reflect the full diversity and evolution of MSS terminals and operational environments;
(iii) the studies in ECC 263 reach differing conclusions, and CEPT initiated further work to address inconsistencies (for example ECC Report 299); and
(iv) the report largely considers IMT operation in supplemental downlink (SDL) configurations, while South Africa is considering time-division duplex (TDD) operation, which presents a materially different interference environment.

These limitations reinforce the need for South Africa-specific feasibility studies (including TDD and aggregated interference scenarios) before any policy or assignment trajectory is contemplated in the 1492-1518 MHz band.

At the ITU level, **Resolution 223 (Rev.WRC-15)** explicitly calls for compatibility studies and technical measures to ensure coexistence between IMT in 1492–1518 MHz and MSS in 1518–1525 MHz, reflecting the recognised sensitivity of this adjacency.[2] More recently, **Report ITU-R M.2529 (2023)** details the interference mechanisms (unwanted emissions and overload/blocking) and evaluates scenarios across maritime, aeronautical, and land terminal environments, including the effect of frequency separation.[3]

Against this evidence base, any approach that enables IMT deployment in the 1492–1518 MHz band without robust, enforceable protections creates a significant and permanent risk of harmful interference to safety-related, operationally sensitive MSS services that are difficult to remediate once large-scale terrestrial networks are deployed.

2. Public-interest services at stake

The L-band MSS ecosystem is relied upon for functions that support, among others:

- **Aviation safety and safety-of-flight communications**, including satellite services used for aeronautical communications in the broader aviation safety environment, particularly where reliability and wide-area coverage are required (including as a complement to terrestrial systems).[4]
- **Maritime safety communications**, including safety-related maritime terminal uses within MSS and the wider maritime distress and safety environment.[5]
- **Disaster resilience and continuity of communications**, where satellite networks remain operational during major terrestrial network outages and in remote or hard-to-serve areas.

These use cases are precisely why adjacent-band interference carries potential consequences for public safety, service continuity, and national resilience.

3. The L-band workshop (March 2025) and the subsequent objection letters

The L-band workshop in March 2025, convened by GPP in collaboration with Viasat, was a critical step toward a fact-based discussion. As represented by international and national, both public and private

[2] https://www.itu.int/dms_pub/itu-r/oth/0c/0a/R0C0A00000C0034PDFE.pdf
[3] https://www.itu.int/dms_pub/itu-r/opb/rep/R-REP-M.2529-2023-PDF-E.pdf
[4] Ibid
[5] See note 3

sector organisations, including representatives from IMSO, ICAO, Civil Aviation, Maritime, the Ministry of Transportation, and industry participants, the workshop record established four central points:

1. There was **no technical or operational consensus** supporting the feasibility of coexistence between terrestrial IMT operations in 1492–1518 MHz and incumbent MSS operations above 1518 MHz in a manner that would reliably protect MSS terminals under realistic deployment conditions.
2. **Overwhelming concerns** were raised by satellite operators and stakeholders with aviation and maritime safety interests regarding the **irreversible interference risks** once IMT deployments scale.
3. The workshop demonstrated that proceeding with IMT identification/enablement outcomes impacting the 1492–1518 MHz range was, at minimum, premature in light of the evidence presented and the safety-critical services potentially affected.
4. It would be prudent of the Authority to maintain the IMT provision within the core band identified up to 1492 MHz, as per the ITU-R footnote 5.346[6]

Following the workshop, we submitted a detailed objection letter (with supporting technical material) that encapsulates these concerns and urges ICASA to avoid any NRFP trajectory that could weaken protection of the MSS L-band ecosystem.

4. Reinforcement from SADC regional consensus (CRASA/ECC – September 2025)

These concerns were further reinforced at the regional level during the CRASA Electronic Communications Committee (ECC) engagement in September 2025, where there was overwhelming support from SADC member states for protecting the L-band and maintaining the spectrum assignment within the core band, up to 1492 MHz, as per ITU-R FN 5.346.

This regional stance is the product of sustained SADC spectrum planning coordination aimed at avoiding harmful interference, promoting harmonisation and safeguarding services critical to regional security, transport and economic stability. In our view, South Africa proceeding against this clear regional direction risks isolating national spectrum policy, creating cross-border interference complexity, and undermining SADC's collective regulatory credibility—particularly given ICASA's stated objective to align the NRFP with regional plans.

5. Why the risk remains urgent: the technical basis is clear and recognised by ICASA instruments

The adjacent-band risk is well documented:

- ECC Report 263 discusses key interference mechanisms (including blocking/overload and out-of-band emissions) and proposes mitigation approaches. However, as underscored during the January 2026 public hearings, the report's assumptions and proposed measures (including a 1 MHz guard band) are not demonstrated to protect MSS in practice, particularly for sensitive MSS terminals operating in or near the 1518-1520 MHz block. The report does not address the TDD deployment scenarios contemplated for South Africa. For these reasons, ECC 263 cannot, on its own, be relied upon to justify planning outcomes that could be interpreted as enabling IMT operation above 1492 MHz; instead, it points to the need for comprehensive, South Africa-specific feasibility studies that reflect local deployment realities and aggregated interference.

[6] https://www.itu.int/dms_pub/itu-r/opb/reg/R-REG-ROP-2021-R03-PDF-E.pdf

- Report ITU-R M.2529 (2023) sets out the interference mechanisms (unwanted emissions; overload/blocking) and models maritime, aeronautical, and land scenarios, including frequency-separation considerations.[7]

Importantly, ICASA's own Final Radio Frequency Spectrum Assignment Plan for IMT1500 (1427–1518 MHz) recognises the sensitivity of IMT–MSS adjacency. It cites the ongoing ITU work under Resolution 223 and explicitly notes that, based on current study results, one possible measure is for administrations to consider additional frequency separation below 1518 MHz, and that administrations should consider compatibility results "around seaports and airports", among other measures. It also references restrictions, such as base-station power constraints, in the 1512–1518 MHz band in specific contexts.[8]

Against this record, we remain concerned that the planning direction in the Second Draft NRFP 2025 may be interpreted as continuing to enable IMT outcomes in 1492–1518 MHz without sufficiently clear and enforceable safeguards, and without a transparent explanation of how the 2025 stakeholder record has been weighed.

6. Specific requests for information and clarification

In light of the above, we respectfully request that ICASA provide the following information regarding the development of the final NRFP:

a. Workshop and submission integration

How have the specific technical arguments and opposition presented during the March 2025 L-band workshop, and in the subsequent industry objection letters (including our own), been formally considered and addressed in the revision from the first round of consultation to the Second Draft NRFP 2025, and in the pathway to the final NRFP?

b. Regional alignment

How does ICASA intend to reconcile any proposal that enables IMT planning outcomes in 1492–1518 MHz with the stated position of SADC member states (as confirmed through CRASA/ECC engagement), which opposes such assignment outcomes above 1492MHz, particularly given ICASA's stated intent to ensure regional harmonisation through AfriSAP and the SADC Frequency Allocation Plan?

c. Impact assessment

Has ICASA conducted or commissioned a detailed, independent study assessing the full economic and operational impact of potential interference to aeronautical and maritime safety services (and other resilience-critical MSS use cases), weighed against the perceived benefits of IMT in this specific band? If so, we request that the study be shared with all relevant industry players.

d. Alternative bands

We request clarity on ICASA's assessment of alternative, internationally harmonised spectrum options for IMT capacity expansion that do not carry the same level of risk to safety-of-life services, noting that the industry increasingly looks to other capacity bands for IMT growth.

[7] https://www.itu.int/dms_pub/itu-r/opb/rep/R-REP-M.2529-2023-PDF-E.pdf
[8] https://www.gov.za/sites/default/files/gcis_document/202304/48353gon3244.pdf

7. Proposed way forward and follow-up actions

To keep the process aligned with the technical evidence, the L-Band workshop in March 2025, and regional consensus, we strongly urge ICASA to:

i) Remove the identification/enabling approach for IMT in 1492–1518 MHz from the final NRFP, or otherwise provide an unequivocal policy confirmation that assignment outcomes will not proceed above 1492MHz, supported by clear NRFP text and enforceable conditions.

ii) Formally align South Africa's position with the SADC consensus to protect the adjacent MSS ecosystem starting at 1518 MHz, including safety and disaster-resilience applications, in a manner consistent with ICASA's harmonisation objectives.

iii) Establish a focused L-band technical engagement/forum with affected stakeholders (satellite, aviation, maritime, and terrestrial mobile) to agree on a forward-looking, interference-free roadmap for L-band utilisation in South Africa, including monitoring and enforceability measures.

iv) Publish a response matrix to the issues raised in the workshop record and objection letters, setting out ICASA's technical and policy rationale for the final decision and explaining what protections (including any frequency separation measures contemplated under the IMT1500 framework) will be applied in practice.

8. Conclusion

The proposed IMT trajectory in and around the upper L-band is a matter of significant consequence. It risks undermining spectrum harmony, jeopardising safety- and resilience-critical MSS services, and placing South Africa at odds with regional partners and international safety organisations (such as ICAO, IMO, IMSO) at a time when the NRFP process is expressly aligned with ITU and regional frameworks.

We remain available to engage further and to provide any additional information required.

Respectfully yours,

Wydeman Coetzee
Global Policy Partners (GPP)
(On behalf of Viasat)