MTN Presentation on the 2nd Draft National Radio Frequency Plan

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Date: 16/01/2026

MTN

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1. Introduction

- MTN commends the Authority for developing a second draft of the National Radio Frequency Plan.
- This regulation forms the foundation of mobile broadband that enables economic growth and supports South Africa’s Digital Future
- By taking a consultative approach with industry the Authority has taken the opportunity to build on their extensive work and address the concerns of stakeholders identified in the initial draft regulation.
- MTN welcomes the review of the National Radio Frequency Plan and appreciates the extensive work that has been done by the Authority in arriving at the current version of the Draft NRFP-25.

2. General Comments

- Mobile broadband is seen as the main medium to access broadband services in South Africa, consequently, timely access to sufficient and affordable spectrum is critical.
- In order to provide ubiquitous mobile broadband, operators must invest vast amounts of capital to deploy radio access network (RAN) infrastructure to fully utilise the spectrum in an efficient and effective manner.
- To encourage this level of investment, clear and articulate legislation and regulations which are transparent to all in the sector and applied consistently to all are of paramount importance.
- Regulatory certainty is critical without which could result in negative and unintended consequences for the telco sector.

Radio Frequency Migration Plan

- MTN contends, in line with regulation, that a migration plan should be included (or finalised in conjunction) with the development of a National Radio Frequency Plan.
- While the draft Migration Plan was published in March 2024 , it was never finalised, and the outdated 2019 Migration Plan remains in force.

Radio Frequency Assignment Plans

- Several spectrum bands urgently require the development of Radio frequency assignment plans (RFSAP) and/or the updating of existing RFSAP to accommodate technological changes e.g. IMT1800 & IMT2100.
- RFSAP are no longer in line with international counterparts and do not take into account advances in technology such as active antenna systems (“AAS”) which include changes in power limits parameters

Errors & Obsolete References

- MTN suggests the removal of the reference to Broadband Public Protection and Disaster Relief (PPDR) in the IMT700 and IMT800 bands for future needs.
- As the Authority has licensed these bands for IMT this reference for potential future use is no longer potentially feasible.

High Altitude IMT Base Stations

- WRC-23 resolved the use of HIBS in several spectrum bands
- The Authority in previous draft regulation indicated their intention to develop a Regulatory Framework and associated frequency arrangements
- To ensure certainty around the future of HIBS and IMT allocations the Authority should initiate the consultation process and ultimately conclude the Regulatory Framework for HIBS.

3. Comments on Specific Frequency Bands

Radio Frequency Spectrum Bands 694 – 960MHz

- While this band is included in those bands identified by HIBS, MTN would suggest that this range be under consideration for Direct to Device/Direct to Cell LEO services, merely as a way to align with the spectrum band as outlined in AI 1.4 for Region 1

Radio Frequency Spectrum Band 1 980-2 010 MHz

- MTN supports the use of radio frequency spectrum band n256 for IMT Non-Terrestrial Network (Satellite) use.
- MTN suggests that a feasibility study is conducted on the viability to accommodate NTNs in these bands for direct-to-device satellite communications.

Radio Frequency Spectrum Band 3 600 - 3 800 MHz

- MTN has noted that the Authority has incorporated the outcome of WRC-23 and has identified this band as IMT.
- Additionally, MTN is aware of the licensing of spectrum within this band, prior to WRC-23, for BFWA on a secondary basis.
- Given the elevation of this frequency spectrum band to IMT status, it is critical that the Authority provide clarity on whether the Authority will migrate existing licensees as mandated in the ECA.

Radio Frequency Spectrum Band 6.425-7.125 GHz

- MTN supports ICASA's adoption of the WRC-23 footnote and the identification of the upper 6 GHz band for IMT.
- Consistent with the African Telecommunications Union (ATU) and South Africa's position at WRC-23, MTN submits that the upper portion of the band should be designated for exclusive IMT use.
- No additional utilization of the band should be introduced until a structured migration process is developed and completed.
- Any reference to RLAN should be removed

Radio Frequency Spectrum Band 24.25-27.50GHz

- This 26GHz mmWave 5G spectrum is ideal for new 5G use cases requiring low latency and high bandwidth.
- For South Africa to keep up with the global pace, MTN recommends that the migration plan address this band following its change of allocation to MOBILE with IMT identification.
- MTN welcomes the decision by the Authority to develop a radio frequency spectrum assignment plan in this band and urges ICASA to do this expeditiously.

Radio Frequency Spectrum Band 37.00-40.00GHz

- MTN suggests that the inclusion of this radio frequency spectrum band should be incorporated in the next iteration of the IMT roadmap that the Authority will develop.
- MTN welcomes the decision by the Authority to develop a radio frequency spectrum assignment plan in this band.

Radio Frequency Spectrum Band 47.2-48.20GHz

MTN is amenable to the Authority's incorporation of the 47GHz band (n262) for IMT services and is satisfied with the recommendations made.

Thank you