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20 October 2017

Chairperson
Independent Communications Authority of South Africa
Block C, Pin Mill Farm
164 Katherine Street
Sandton

Via Email : Chairperson@icasa.org.za

Via Email : rmakgotlho@icasa.org.za

Dear Sir,

**Re: Submission relating to the Second draft Radio Frequency Spectrum
Assignment Plan for the frequency band 825 to 830 MHz and 870 to 875
MHz**

MTN would like to thank the Authority for the opportunity and invitation to make submissions on the Second draft Radio Frequency Spectrum Assignment Plan for the frequency band 825 to 830 MHz and 870 to 875 MHz for public consultation.

Please find herewith our comments in respect of each of the radio frequency assignment plans published by the Authority for your consideration.

Furthermore, MTN records that it wishes to participate in oral hearings should the opportunity arise.

Should you have any further queries please do not hesitate to contact writer hereof.

Yours faithfully,

A handwritten signature in dark ink, appearing to read 'Geoffrey Blake', with a stylized flourish at the end.

Geoffrey Blake
Senior Manager: Technical Regulations & Mandated Provisioning
MTN (PTY) LTD



**MTN'S SUBMISSION ON THE SECOND DRAFT RADIO
FREQUENCY SPECTRUM ASSIGNMENT PLAN FOR THE
FREQUENCY BAND 825 TO 830 MHz AND 870 TO 875
MHz.**

20 October 2017

1. INTRODUCTION

On 1 September 2017, in Government Gazette No: 41082, ICASA ("the Authority") published the second draft Radio Frequency Spectrum Assignment Plan for the frequency band 825 to 830 MHz and 870 to 875 MHz.

MTN welcomes the publication of the draft regulations. As per previous submissions of the aforementioned frequency band MTN's submission is generally supportive of the approach taken by the Authority, as such we have limited our response to points of suggested amendments that need to be incorporated and/or changed. Consequently, our submission attempts to provide commentary on MTN's position on the subject matter as a whole.

MTN confirms its willingness to participate in any oral hearings that may be scheduled.

2. GENERAL COMMENTS

The frequency band 825-830MHz paired with 870-875 MHz provides a total bandwidth of 2x5MHz FDD for IMT850. Channel arrangements for the IMT850 band are based on the Region 1 recommendation by the ITU. The adjacent assignments are illustrated in the figure below taken from the IMT850 Radio Frequency Assignment Plan. In this regard MTN supports the proposed channel arrangement.

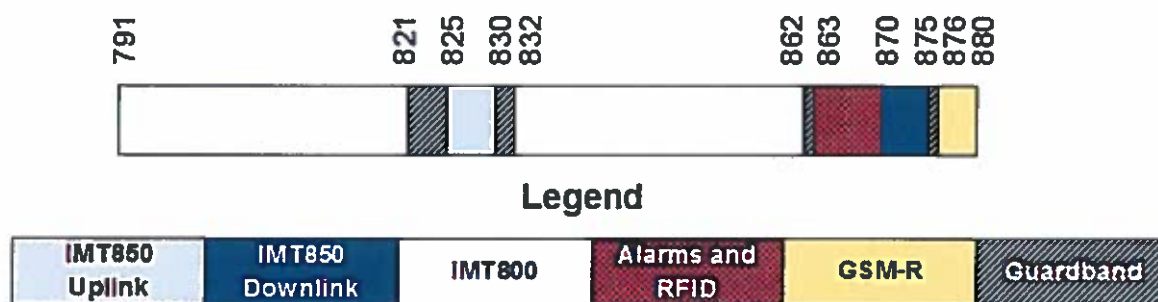


Figure 1: Channel arrangements for IMT850

MTN further recognises that the channel arrangement takes into consideration the recommendations contained within ATU document detailing the proposed guidelines on the harmonised use of the digital dividend in Africa. This aforementioned document recommends that for countries in Africa and where possible, to adopt 2x30MHz band plan that consists of 832-862MHz (uplink) paired with 791-821MHz (downlink) on the 800MHz band.

MTN asserts that in the proposed configuration there exists a strong possibility of interference within the IMT800 band. Consequently, the Authority is advised that precise limitations are associated with the amended licencing and that these are strictly enforced.

It is also critical that clarity be provided in the final assignment plan on the responsibility of limiting out of band emissions.

In that regard MTN, refers the Authority to the footnotes of the National Radio Frequency Plans of 2013 published in General Notice 354, Government Gazette No. 36336 on the 28 June 2013, specifically Note 4 (ii) of NF 9, which states that in South Africa the use of the 800MHz band will take precedence over the use of the 850MHz band.

Finally, Section 8.1 states that an Invitation to Apply shall be published for new assignments in this band in line with regulations developed in terms of section 31(3) of the Act. Additionally under Section 6.2 Implementation, 6.2 states that no new assignment for IMT850 in the band 824-832 MHz paired with 869-877 MHz shall be approved unless they comply with this RFSAP. These two sections above are immaterial given that there is no spectrum available in the IMT850 band to be assigned to other parties. Furthermore, any assignment outside 825-830MHz//870-875MHz will lead to the constriction of the guard bands between the various services, which are already deemed to be considered inadequate to address interference.