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28 September 2012

Mr. Manyaapelo Richard Makgotlho
The Independent Communications Authority of South Africa (ICASA)
Private Bag XI0002
Sandton
2146

Dear M4. Makgotlho

Re: Draft Frequency Regulation and Frequency Migration Plan August 2012 ICASA Notice 606 of 2102 Government Gazette 17 August 2012, No. 35598

The Meraka Institute, an Operating Unit of CSIR would like to thank you for the opportunity to comment on the Draft Frequency Regulation and Frequency Migration Plan, August 2012, ICASA Notice 606 of 2102, Government Gazette 17 August 2012, No. 35598.

The Meraka Institute is actively engaged in telecommunications research that requires access to radio spectrum. Many projects are undertaken with funds made available by the Department of Science and Technology.

Meraka is deeply aware of the long process leading up the publishing of the above regulations and migration plan.

Our submission is attached. Our main concerns regarding the migration plan deal with the possible economic impact of some of the proposals on existing services. We are also concerned that in some instances the migration proposals are only aimed at aligning the existing National Radio Frequency Plan as published in Government Gazette 33409, dated 30 July 2010 with that of the ITU-R Regulations and Regional Plans, but not necessarily in line with the latest developments within the ITU after the last World Radio conference WRC 2011/12.

We respectfully request these comments are taken into account when finalising the above regulations and migration plans.

Meraka would welcome an opportunity to make oral representations at the public hearings scheduled for 8 – 12 October 2012.

Yours sincerely

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Geoff Daniell

Telecommunications Consultant

Meraka Institute