

To: Independent Communications Authority of South Africa
350 Witch-Hazel Road, Eco Park
Centurion
Mr Davis Kgosimolao Moshweunyane
Mr Manyapelo Richard Makgotlho

Re: 2nd draft National Radio Frequency Plan 2025

Date: 11 December 2025

From: Amazon Inc., Apple Inc., Broadcom Inc., Cisco Systems Inc., Hewlett Packard Enterprise, Intel Corporation, Meta Platforms Inc.

We welcome the opportunity to comment on the Independent Communications Authority of South Africa (“the Authority”) second draft National Radio Frequency Plan (“NRFP v2”) 2025. Given the increasing economic and social value of wireless broadband connectivity, we fully support the Authority’s efforts to ensure efficient and flexible use of spectrum and to support the introduction of new technologies and innovative wireless services.

We applaud the Authority’s decision to update the NRFP v2 2025 to reflect its prior decision to allow licence-exempt radio local area networks (“WAS/RLAN”) operation in the lower 6 GHz (5925-6425 MHz) band (“L6 GHz band”) in line with African Telecommunications Union (“ATU”) Recommendation ATU-R 005, SS4-1(3) and as captured in the Radio Frequency Spectrum Regulations, 2015 – Annexure B as amended by GG No. 48643 (Notice 1822) of 23 May 2023. This was an important first step that will assist the Authority to achieve its broadband connectivity goals.

We also applaud the Authority’s decision to allow licence-exempt radio local area networks (“WAS/RLAN”) operation in the upper 6 GHz (6425-7125 MHz) band (“U6 GHz band”) in line with ITU-R RR 5.457E, which was adopted at WRC-23 and recognises that this frequency band is also used for the implementation of wireless access systems (WAS), including radio local area networks (RLANs).

We recommend that the Authority should amend Annexure B of the Radio Frequency Spectrum Regulations 2015 to include the operating conditions, including operating modes and output power, of WAS/RLAN in the band 6425-7125 MHz. These operating conditions should be similar to those for licence-exempt WAS/RLAN in the lower 6 GHz (5925-6425 MHz) band i.e. –

- 23 dBm e.i.r.p. Low Power Indoor (LPI) use Only/Outdoor use Not Allowed
- 14 dBm e.i.r.p. Very Low Power (VLP) Indoor/Outdoor

Additionally, the Authority should consider implementing Dynamic Spectrum Access (DSA), specifically by way of Automatic Frequency Coordination (AFC), for Standard Power WAS/RLAN in the entire 6 GHz band (5925-7125 MHz).

Conclusion

The undersigned are committed to supporting the Authority in its efforts to ensure spectrum is managed in an efficient and flexible manner and to enable different users and industries to take advantage of technological advancements. We look forward to working with the Authority on the successful and sustainable deployment of advanced wireless technology and services and strengthening South Africa’s position in the global digital economy.

We would welcome the opportunity to deliver an oral presentation, if the Authority decides to host public hearings.

/s

Michael Feldman

Manager, International Public Policy
Amazon, Inc.
Email: mjfeld@amazon.com

Graham MacDonald

Senior Spectrum Policy Advisor
Apple, Inc.
Email: graham_macdonald@apple.com

Christopher Szymanski

Director, Product Marketing
Wireless Communications and Connectivity Division
Broadcom, Inc.
Email: chris.szymanski@broadcom.com

Bill Davenport

Senior Director, Connectivity and Technology Policy
Cisco Systems, Inc.
Email: bidavenp@cisco.com

Detlef Fuehrer

Director, Spectrum Management and Regulatory Affairs, EMEA
Hewlett Packard Enterprise
Email: detlef.fuehrer@hpe.com

Prasanna Desai

Sr. Principal Engineer
Wireless Systems and Solutions
Intel Corporation
Email: prasanna.p.desai@intel.com

Fargani Tambeayuk

Director of Public Policy, Francophone Africa
Director of Connectivity and Innovation Policy, Africa
Meta Platforms, Inc.
Email: fargani@meta.com