



Independent Communications Authority of South Africa
Pinmill Farm Block A
164 Katherine street
South Africa

20 October 2017

Attention: Mr Manyapelolo Richard Makgotlho

By email: rmakgotlho@icasa.org.za

SECOND DRAFT RADIO FREQUENCY SPECTRUM ASSIGNMENT PLAN FOR THE FREQUENCY BAND 825 TO 830 MHz AND 870 TO 875 MHz.

- 1 The National Association of Broadcasters (NAB) is a leading representative of South Africa's broadcasting industry, representing the interests of all three tiers of broadcasters. Our members include public, commercial and community broadcasters, as well as signal distributors.
- 2 The NAB has through its numerous submissions actively participated in the Authority's processes towards digital migration and to ensure compliance with international regulations as agreed to and adopted by South Africa.
- 3 On 1 September 2017 the Authority published the second draft radio frequency spectrum assignment plan (plan) for the frequency band 825 to 830 MHz and 870 to 875 MHz for public consultation. Interested persons were given until 20 October 2017 to submit their comments.

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The NAB is a non-profit industry association funded by its members





- 4 The NAB welcomes this opportunity to make a few general comments, which although they may have been raised in preceding submissions, they remain pertinent to the broadcasting industry and are equally relevant to the published notice under consideration.
- 5 The NAB previously pointed out that in the National Radio Frequency Plan 2017 published on 9 December 2016, the Authority had omitted to include broadcasting within the 694 – 790 MHz frequency band notwithstanding a resolution by the International Telecommunications Union that this band be shared by broadcasting services and international mobile telecommunications on a co-primary basis. The NAB is pleased to note this has been rectified in the plan under consideration.
- 6 The NAB notes that appendix A of the frequency plan provides for “broadcasting allotments in accordance with GE89 plan in the process of conversion to GE06”. The NAB respectfully submits that this statement is both misleading and inaccurate. The GE agreements which have been cited above are two separate agreements, independent of each other, however the manner in which they have been cited does not present this clear distinction. For the avoidance of doubt, the NAB proposes that this statement be deleted from the document under consideration.
- 7 In conclusion, as licensed broadcasters, the members of the NAB are committed to the digital migration process and efficient use of spectrum. To this end we look forward to continued information sharing and engagement with the Authority.



Nadia Bulbulia
Executive Director