



Independent Communications Authority of South Africa

350 Witch-Hazel Avenue,

Eco Park, Centurion.

Attention: Mr Manyapelo Richard Makgotlho

By email: rmakgotlho@icasa.org.za

27 August 2021

Dear Mr Makgotlho,

DRAFT NATIONAL RADIO FREQUENCY PLAN, 2021

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 the public broadcaster, commercial and community broadcasters, signal distributors, and associate members which include Arena Holdings, Nemisa and the MDDA.
2. The NAB has through its numerous submissions actively participated in the Authority's processes regarding spectrum management and administration to ensure compliance with international regulations as agreed to and adopted by South Africa, whilst also balancing the interest of licensed operators.

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The NAB is a voluntary industry association funded by its members





3. On 9 July 2021 the Authority published the draft national radio frequency plan for public input and the NAB welcomes this opportunity to provide assistance in this process.

148.5 -160 kHz Broadcasting

4. The NAB notes that this frequency band refers to Long Wave broadcasting, however, there has never been such use of this frequency band in South Africa. Furthermore, the NAB notes that whilst the draft frequency plan under consideration makes a cross reference to the Terrestrial Broadcasting Frequency Plan as amended by government gazette number 36321 which was published on 2 April 2013, there is no mention in the 2013 Terrestrial Broadcasting Frequency Plan of the use of this frequency band for long wave broadcasting. The NAB therefore respectfully submits that the cross-reference to the Terrestrial Broadcasting Frequency Plan of 2013 is an error.

526-1606.5kHz Broadcasting

5. The NAB notes the reference to Digital Satellite Broadcasting services (DSB) under “Typical Applications” of this frequency band. The NAB respectfully submits that the reference that ought to be made is Digital Sound Broadcasting services and not Digital Satellite Broadcasting as this band is not used for Digital Satellite Broadcasting.

235-267 MHz Fixed

6. The NAB notes that the Draft Frequency Plan makes provision for future consideration for broadcasting services with respect to the 238-240Mhz frequency band. The NAB submits that channel 13F in the 239.200Mhz frequency band is used for Digital Audio Broadcasting (DAB) as it has been



used to conduct all the various DAB+ trials. The NAB further submits that this frequency band can be used throughout South Africa as a possible national Mux. The NAB therefore supports that the permanent allocation of this frequency band for DAB+ use as all available DAB+ receivers can tune to this frequency.

694 – 790 MHz and 790 – 862 MHz

7. The NAB submits that whilst the switching off of analogue television transmission has begun, the completion of the migration process has been laboured with numerous challenges, in particular the unavailability of set-top boxes, the lack of consumer support structures and revisions to the broadcasting digital migration delivery model. These delays pose a significant risk to the protection of analogue services, particularly those of the SABC and eTV.
8. As licensed broadcasters, the members of the NAB are committed to the digital migration process and efficient use of spectrum. To this end, there have been ongoing engagements between NAB members and the Minister of Communications and Digital Technologies.
9. The NAB notes that the draft frequency plan proposes the deletion of Broadcasting as a primary service in these bands. The NAB further notes that the only reference to broadcasting in these bands is under the comments column, wherein it is stated that *“Band IV/V analogue television is to be migrated to digital television and ensure harmonization with SADC”*.
10. The NAB respectfully submits that the removal of broadcasting as a primary service would have dire consequences for broadcasters who are still operating in these bands as they will no longer enjoy protection against



interference from other services. As the Authority is fully aware, the migration from analogue to digital terrestrial television broadcasting is yet to be successfully concluded. Furthermore, even after migration, there will still be a requirement for digital-to-digital migration (frequency re-stacking), which may take a year or more to finalise. Currently, only the Free State province has been migrated from analogue to digital television, with the exception of Bloemfontein.

11. The NAB further submits that the deletion of broadcasting as a primary service in these bands may lead to legal challenges between primary services and broadcasting services still operating in these bands. The NAB respectfully reminds the Authority that under the International Telecommunication Union's Region 1 allocation, broadcasting is still recognized as a primary service. The NAB therefore cautions the Authority against the removal of broadcasting services under the aforementioned frequency bands as broadcasting ought to remain a primary service in these bands until the country has fully migrated from analogue to digital terrestrial television and completed the re-stacking process.
12. Section 30(2)(b) of the Electronic Communications Act 36 of 2005, as amended, provides that in controlling, planning, administering, managing and assigning the use of the radio frequency spectrum, the Authority must take into account modes of transmission and efficient utilisation of the radio frequency spectrum, including allowing shared use of radio frequency spectrum when interference can be eliminated or reduced to acceptable levels as determined by ICASA.
13. The NAB therefore recommends that the digital divided spectrum should be brought to use only after analogue switch-off, and digital to digital migration has been completed, even if the bands are licensed beforehand. This will



mitigate against interference and disruption of services in line with objects of the Electronic and Communications Act, 2005, as amended.

1452 – 1492MHz Broadcasting

14. The NAB submits that whilst this band of frequencies refers to the L Band for DAB, this band is no longer used for DAB/+ rollout and radios produced from 2013 no longer support it. The NAB has in previous submissions recommended that this band be relocated for other uses such as Studio Transmitter links as these devices now carry digital sound transmissions between studios.

In conclusion, the NAB thanks the Authority for the opportunity to make this submission and we look forward to continued information sharing and engagement.

Yours faithfully,

NADIA BULBULIA
EXECUTIVE DIRECTOR
Sent electronically without signature