



The Independent Communications Authority of South Africa
The Chairperson, Mothibi G. Ramusi
350 Witch-Hazel Ave
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Centurion, 0144

For the attention of: Mr Davis Kgosimolao Moshweunyane / Mr Manyaapelo Richard Makgotlho

Per email: dmoshweunyane@icasa.org.za / rmakgotlho@icasa.org.za

11 December 2025

Dear Chairperson

SECOND DRAFT NATIONAL RADIO FREQUENCY PLAN 2025

1. The National Association of Broadcasters (**NAB**) refers to the publication by the Independent Communications Authority of South Africa (the **Authority**) for public consultation of the Second Draft National Radio Frequency Plan 2025 in the Government Gazette No. 53637, Notice 3585 of 2025 (the **Second Draft Radio Frequency Plan**).
2. The NAB is a leading representative of South Africa's broadcasting industry, representing the interests of all three tiers of broadcasters (public, community and commercial). Our members include the SABC; all the licensed commercial television broadcasters; e.tv, Multichoice, M-Net, independent commercial radio broadcasters such as Kaya FM, YFM, Smile FM, Rise FM, YOU FM, Hot 102.7FM, and radio services of media groups Primedia, Kagiso Media, GH Media, AME, MSG Afrika and a number of community radio broadcasters, and a community television broadcaster, Faith Terrestrial. The NAB membership also extends to signal distributors as well as a range of industry associates.
3. The NAB welcomes the invitation by the Authority to make representations on the Second Draft Radio Frequency Plan. The NAB understands that individual NAB members will be making individual submissions to the Authority on the Second Draft Radio Frequency Plan. As such, the NAB will provide a high-level submission on key principal concerns relating to the broadcasting spectrum used by sound and terrestrial television broadcasters. The NAB

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The NAB was established in 1993 as a voluntary association funded by its members



participates in this process with the aim of providing constructive input to ICASA and looks forward to engaging further with the Authority on these issues.

4. At the outset, the NAB notes that the second draft contains very few substantial changes from the first draft, and therefore the NAB reiterates its submissions made to the Authority dated 13 June 2025.
5. In addition, the NAB notes the following:
 - 5.1. On page 19 of the Notice, which relates to the Terms, Definitions and Acronyms, the NAB notes that DAB+ is missing from the list, while all DRM standards are included. As DAB+ is a recognised digital broadcasting standard and is referenced elsewhere in the document, the NAB requests that it be included for completeness and consistency prior to the publication of the final Radio Frequency Plan.
 - 5.2. The NAB notes that DRM30 has now been correctly included in the section on Medium Wave (MW) and the section on the HF bands (Shortwave Band) used for Broadcasting.
 - 5.3. The summary of analysis on pages 115 and 116 of the Notice relating to the 87.5–108 MHz band (FM Radio Band) indicates that DRM+ proved technically viable in local conditions. However, the NAB notes that the plan does not mention two critical limitations of the trial. First, that the extremely low power levels used did not permit interference testing with the adjacent aeronautical band (108–117.975 MHz), and second, that the intermodulation effects on existing analogue FM receivers were not tested, even though such effects may introduce audible hiss on analogue services. The NAB submits that these omissions should be clearly acknowledged in the final Plan to avoid misinterpretation of the trial's scope and conclusions.
 - 5.4. It is noted that on page 139 regarding the 174–223 MHz band, that the 214–223 MHz band has long been allocated to DAB+ (including in the 2013 National Frequency Plan), however the Second Draft Plan 2025 continues to assign this spectrum partly to two DTT-T2 VHF multiplexes. It is further noted that comments in the First Draft Plan 2025 indicate that the 7-multiplex DTT-T2 plan is already fully accommodated in the UHF band (470–694 MHz). It is therefore highly unlikely that VHF Band III will ever be used for DTT-T2. This spectrum remains an essential range for DAB+, and all commercially available DAB+ receivers tune

across this band. It is noted from the summary of analysis that ICASA will conduct a study to “identify the highest-value users and develop RFSAP.” However, the acronym RFSAP is not defined in the Second Draft Plan 2025, which presumably means Radio Frequency Service Ancillary to Program Making”. Existing definitions only cover “RF” and “SAP” separately, leaving uncertainty as to its intended meaning. The NAB submits that clarification is needed on whether initiating an RFSAP study delays or prevents spectrum allocation for services such as DAB+, and how this is aligned with the DTAG processes, which were promulgated in April 2021 but have not yet been operationalised. The NAB requests that timeframes, scope, and regulatory implications of the RFSAP process be clearly specified in the final Plan.

- 5.5. The NAB welcomes the proposal to allocate the 214–240 MHz band (page 140 and 141 of the Draft Plan), including Channel 13F (239.200 MHz), for DAB+, as this aligns with the frequency of the current DAB+ trial.
- 5.6. The NAB notes that the 223–230MHz band referenced on pages 141 and 142 of the Draft Plan is already allocated to DAB+, however, the Summary Analysis indicates that an RFSAP will be developed. As the 223–230MHz band already forms part of the SADC regional plan for the introduction of DAB+, the NAB has concerns that further RFSAP-based delays could hinder South Africa’s alignment with regional harmonisation efforts and potentially delay the introduction of DAB+ in Southern Africa. The NAB requests that clarity be provided in the final plan on whether these studies will postpone or suspend deployment of digital terrestrial radio technologies.
- 5.7. The inclusion of DSB/DAB+ as typical applications under the 214 – 240MHz band on page 143 of the Draft Plan is noted. The NAB notes that the overall treatment of digital terrestrial radio services remains unclear in the Draft Plan. The NAB submits that a more explicit statement of ICASA’s policy direction regarding digital radio services (DAB+, DRM30, DRM+) is necessary to provide certainty for industry stakeholders.
- 5.8. Regarding the L-band for TDAB 1452-1492 MHz (page 205 of the Draft Plan), it is noted that the Draft Plan indicates that this band is assumed to be released to IMT, consistent with recommendations provided during comments on the First Draft. The NAB submits that this position should be confirmed in the final plan.



- 5.9. The NAB notes that on pages 452 to 457 that UHF Analogue Television has been completely removed from the Frequency Plan in the bands reserved for broadcasting (470 to 694MHz). As Free-to-Air broadcasters are still reliant on analogue television, the NAB submits that this removal is premature as there is no confirmed date for final analogue switch-off.
6. In addition to the above, the NAB notes that the frequency bands listed in Column 1 (i.e., 3600-3800 MHz and 3800-4200 MHz on pages 246 and 248) should be amended to be correctly reflected across Columns 1 to 4 on those pages. The “Typical Application” column should be aligned with the “ITU Region 1 allocation” column to ensure consistency and regulatory clarity.
7. The NAB thanks the Authority again for the opportunity to make representations on the Draft Radio Frequency Plan and is available to engage further with the Authority on the above submissions.

Yours sincerely

[Unsigned due to electronic transmission]

Nadia Bulbulia
Executive Director