

25 August 2021

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Independent Communications Authority of South Africa (ICASA)

350 Witch-Hazel Ave
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"CONFIDENTIAL"

Attention: Mr Manyapelolo Richard Makgotlho

Per e-mail: rmakgotlho@icasa.org.za

RE: NOTICE REGARDING THE DRAFT NATIONAL RADIO FREQUENCY PLAN 2021 FOR PUBLIC CONSULTATION ("THE DRAFT PLAN")

Dear Sirs

1. Netstar (Pty) Ltd ("Netstar") has been a pioneer in the stolen vehicle and recovery industry in South Africa. Netstar is an essential services provider which is registered as a security service provider with the Private Security Industry Regulatory Authority (PSIRA) and plays an instrumental role in the fight against vehicle crime in South Africa. In the last 5 (five) years Netstar has successfully recovered 25 090 stolen vehicles. Our services range from basic phone-in stolen vehicle recovery systems to advanced fleet management solutions, as well as vehicle asset tracking devices with GPS/GPRS functionality, in South Africa and surrounding countries.
2. Netstar's entire subscriber base comprising 1 324 962 active vehicles is dependent on RF (radio frequency) units, either as stand-alone RF vehicle tracking units, or as back-up RF units to GSM recovery and/or fleet management units. Due to the nature of its operations, Netstar holds a number of radio spectrum frequency licences in the Western Cape, Gauteng, KwaZulu-Natal, the Free State and nationally.
3. ICASA, under the powers afforded to it in the Electronic Communications Act, 36 of 2005, published the Notice regarding the Draft National Radio Frequency Plan 2021 for Public Consultation ("**the Draft Plan**"). The Draft Plan invites interested persons to submit written representations in respect of the plan and as such Netstar hereby submits the below representations.
4. **VHF PAGING SYSTEMS: 170.900 MHz Frequency (as set out from page 108 of the table of frequency allocations)**
 - 4.1 Autopage Cape (Pty) Ltd is a wholly owned subsidiary company of Netstar and is the license holder of the 170.9MHz frequency license. Netstar presently utilises the 170.900 MHz frequency for paging base station transmitting and such use has always been in the POGSAC (Post Office General Standard Allocation Committee) format.
 - 4.2 The Draft Plan has made provision for the grouping of the 170.900MHz frequency into the 162.0375 – 174MHz band. The Draft Plan is however silent on whether the regrouped frequency can still be used in the POGSAC format. Clarity is required on the format to be used

for the regrouped frequency and whether there is any impact on utilizing the POGSAC format for this frequency.

5. UHF CELLULAR BANDS: 915MHz Frequency (as set out from page 134 of the table of frequency allocations)

5.1 Netstar presently utilises the 915MHz frequency for vehicle recovery.

5.2 This frequency was listed under the band allocation 890 – 942MHz and 880 – 915MHz. According to the Draft Plan vehicle location must be within the 915.1 – 921MHz band.

5.3 Netstar wishes to comply with ICASA’s approved processes and will undertake to vacate the existing 915MHz frequency , subject to approval from ICASA of its application for frequency licenses in respect of the 915.1 – 921MHz band, to which it will migrate. This is necessary in order for Netstar to continue with its business operations and service which will impact the 1 324 962 vehicles belonging to its customer base throughout South Africa. For Netstar to achieve this, it will require a minimum period of 5 (five) years in order to migrate failing which we will incur significant costs of as follows in respect of the migration:

Notice Period in Years	Illustrative Migration Costs
1	R1 176,00 m
2	R882,90 m
3	R589,20 m
4	R294,90 m
5	R0,00 m

5.4 The Draft Plan is silent on whether there are any time periods and or deadlines that need to be adhered to when migrating to the new band or what provision is being made by ICASA to migrate affected parties such as Netstar to the new bands taking into account the license holder but also its customers. The Draft Plan is also silent on the costs that will be associated with the move to the new band. We require this to be clarified.

5.5 Please be advised that we require our representations to remain confidential and will accordingly submit our application in terms of section 4D of the ICASA Act.

5.6 We look forward to favourable consideration of our recommendations.

Yours faithfully



Charles Morgan
Executive: Customer Operations