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To The Independent Communications Authority of South Africa,

RE: Draft Radio Frequency Plan GG 40480 (notice 861), published 9th December 2016,
Pages 185-415. "450–470 Mhz band, Fixed Mobile, footnote 5.286AA".

With reference to the ITU Region 1 allocations & footnotes – IMT 450 (450-470 Mhz) page 271 of above draft, I wish to comment as follows :–

Many of our clients are utilizing this frequency band & many of their radios cannot be adjusted out of this band, (probably to the lower band of 440-450 Mhz.) & therefore they will have to replace perfectly good radios at great expense.

This could have an impact on our business as our customers may choose other forms of communication technologies not supported by our company.

In the event of the radios that can be programmed, it is going to cost us a significant amount of money to reprogram said radios which may not be able to be recovered from the clients.

Furthermore, certain types of repeater equipment cannot be tuned out of this band, therefore incurring more costs.

Also, the lower band of 440-450 Mhz which we will most likely have to migrate to, includes the licence free frequencies, which are used by thousands of licence free radio operators. These radios can be purchased almost anywhere, and would become a potential source of interference on any radios programmed in this band.

Yours Sincerely
A.P.Roux
Chief Technician