



19 June 2026

To: RRamendments@icasa.org.za

Cc: mmchunu@icasa.org.za

The Independent Communications Authority of South Africa
350 Witch-Hazel Avenue, Eco Point Office
Park Eco Park, Centurion
South Africa

Attention: Mr. Mandla Mchunu-Project Manager

Dear Sir,

**RE: DRAFT AMENDMENT OF THE RADIO FREQUENCY SPECTRUM
REGULATIONS, 2015 IN TERMS OF THE ELECTRONIC
COMMUNICATIONS ACT, 2005 (ACT NO. 36 OF 2005)**

Telesat is grateful for the opportunity to comment on the proposed draft amendment.

We commend this proactive approach aimed at finetuning the national framework for regulation of ESIM and registration of satellite operators given the contemporary and emerging trends in satellite broadband as well as positioning the market to remain attractive to investments.

Our comments are informed by our desire to provide services in the South African satellite communication market through our Telesat Lightspeed system <https://www.telesat.com/leo-satellites> which will further revolutionize the provision of high-capacity, high-speed, and low-latency broadband connectivity on a global scale.

Telesat Lightspeed non-GSO constellation will begin global services in the first quarter of 2028 with an initial system of 156 satellites in low Earth orbit at an altitude of 1,335 km. Telesat also plans to add satellites as demand grows up to 300. The system will operate exclusively in Ka-band and will deliver fiber quality throughput (multiple Tbps of usable capacity with global coverage, Gbps links, low latency) across the globe. Furthermore, it is deemed a future-proof solution for backhaul cellular/5G traffic and will provide high-speed broadband access to rural and remote communities, planes, ships, enterprise and Government via local service providers (i.e. not directly to end users).

Our comments are as follows:

1. Being a global stakeholder in ESIM service delivery, we appreciate the insertion of regulation 28A in the Regulations. We are of the opinion that this insertion will facilitate the seamless delivery of broadband in flight connectivity while promoting market competitiveness and regulatory responsiveness to ESIM service delivery and utilization.
2. Under regulation 28A (6), we kindly ask for the inclusion of **Resolution 123 (WRC-23)**. This resolution specifically applies to ESIM communicating with NGSO satellites in the Ka band and should also be added to row G of Annexure K of the Draft Amendments together with ECC/DEC(15)04.
3. With regards to regulation 28B, Telesat generally supports an “open skies” approach, whereby no specific authorization is required for satellite operators to provide satellite capacity to telecom operators licensed in a country. Telesat is of the view that an open skies policy facilitates the timely deployment of innovative satellite services. However, we appreciate the light landing rights regime proposed by ICASA with a straightforward registration procedure.

Thanking you in anticipation of your cooperation.

Please be assured of our esteemed regards.

Yours Sincerely,



Obiora OFFOR
Regional Director-Africa
Spectrum Policy and Market Access

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