



Policy and Regulatory Affairs

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26 January 2018

Mr Manyapelo Richard Makgotlho,
ICASA
Pinmill Farm
164 Katherine Street
Sandton
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E-Mail: RMakgotlho@icasa.org.za

Dear Mr Makgotlho,

**RE: SABC WRITTEN SUBMISSION TO ICASA ON A NOTICE REGARDING AN INVITATION
FOR FURTHER COMMENTS ON THE DRAFT RADIO FREQUENCY SPECTRUM
ASSIGNMENT PLANS PUBLISHED FOR CONSULTATION**

Attached hereto for your attention, please find the SABC's submission on the draft Radio Frequency Spectrum Assignment Plan for consultation.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Ngoka Judy Monyela', written over a horizontal line.

**Ngoka Judy Monyela
Acting General Manager
Policy and Regulatory Affairs**



**SABC WRITTEN SUBMISSION TO THE
INDEPENDENT COMMUNICATIONS AUTHORITY OF
SOUTH AFRICA**

**ON A NOTICE REGARDING AN INVITATION FOR
FURTHER COMMENTS ON THE DRAFT RADIO
FREQUENCY SPECTRUM ASSIGNMENT PLANS
PUBLISHED FOR CONSULTATION**

26 January 2018

1 Introduction

The SABC would like to thank the Independent Communications Authority of South Africa (“the Authority”) for the opportunity to make representations on the Draft Document on Radio Frequency Spectrum Assignment Plan for specific services (the frequency band 2025 to 2110) “the draft Plan”. The SABC will like to be given the opportunity to substantiate this written submission through oral hearing if the Authority will be holding one.

The SABC supports the Chairperson’s intentions to amend and update the Radio Frequency Spectrum Assignment Plan in order to keep the plan current and in the interest of orderly spectrum management.

As the only public broadcaster within the Republic of South Africa charged with a specific mandate set out in Chapter IV of the Broadcasting Act No. 4 of 1999. The Public Broadcasting Service Charter not only obliges the SABC to provide radio and television programming that informs, educates and entertains; but further states that these are to be made available throughout the Republic. This places a unique obligation on the SABC that requires adequate radio frequency spectrum and protection in order to fulfil this mandate.

Currently, the SABC provides 5 TV Channels and 18 Radio Stations to its audience.

The SABC will largely confine its submission on this draft plan to areas which pertain to its business as the public broadcaster.

2 SABC’s Inputs

2.1 Background

The SABC is currently licensed to operate its Microwave links in the 2300 – 2400 MHz spectrum. The specific frequencies are 2321, 2349 and 2443 MHz at 10 MHz each.

These frequencies are however all unusable as the frequencies are simultaneously licenced to Telkom SA countrywide.

2.2 The addition of TVOB to the application of the band 2025 - 2110 MHz

The Cooperation has brought this interference problem to the attention of the Authority in a meeting at the premises of the Authority on 13th May 2016 and subsequently submitted a letter dated 16th May 2016 to substantiate on the matter.

The Cooperation also lodged an application on 24 February 2017 with the Authority for a change of this frequency band. The Authority declined the application and requested the Cooperation to apply for an “amendment of alternative channels in the 2400 MHz band”.

It is humbly submitted that the entire band of 2300 – 2500 MHz has been analysed and has found that the services cannot operate in this band. An alternative band is required for this important aspect of public service.

On 26 January 2017, the Cooperation in response to the draft update of the National Radio Frequency Plan 2017 requested the Authority to investigate the possibility of using the band 2025-2110 MHz as an alternative for this service. Through this submission, the Cooperation is again urging on the Authority to reconsider the use of the 2025 – 2110 band for Electronic News Gathering and Outside Broadcasting.

3 Recommendations

The Cooperation request that the applications for this band 2025-2110 MHz be extended to include TV Outside Broadcasting and Electronic News Gathering operations as the band 2300 – 2450 MHz which it has currently been licenced for is rendered unusable due to intense use of the band by other licensees operating in that band.