SACF RESPONSE TO ICASA CONSULTATION ON DRAFT MIGRATION PLAN AND IMT ROADMAP

Introduction

1. The SACF is an industry association that represents a broad group of members in the ICT ecosystem and our primary purpose is contributing to creating an inclusive, competitive sector that can attract and sustain investment.

1. The SACF welcomes the opportunity to comment on the draft implementation of the radio frequency migration plan and the International Mobile Telecommunications (IMT) roadmap and express our interest to participate in any further processes, including a public hearing.

2. The SACF expresses its concerns over specific issues related to the Authority's draft implementation of the radio frequency migration plan and the IMT roadmap. Our submission is limited to matters which our members have reached consensus. Any point on which our members have varying opinions is not part of this submission and will be included in their respective submissions.

General Comments

3. Communications infrastructure has become one of the most critical national infrastructures that underpin and support all other sectors of the economy. The current COVID-19 pandemic has demonstrated how ICT infrastructure and services are critical to economies across the globe. Countries almost came to a standstill, a situation that was salvaged by access to communications infrastructure where work, learning, social interaction, commerce, medical access, and most other aspects of life switched to a virtual environment.

4. SACF submits its comments in an environment that has fast-forwarded the reality into a space that WRC-19 had only envisaged in the distant future. It is, therefore, imperative that South Africa adopts a forward-looking and bold approach to enable access to communications in ways that will stimulate economic activity and spur economic recovery.

5. Access to the critical frequency spectrum is key as technologies evolve and the applications and use cases grow. Several frequency bands were identified for IMT at WRC-19. This contributes to the growing number of use cases.

6. The global identification of frequencies for IMT will help unlock economies of scale needed to accelerate the delivery of innovative and affordable 5G services worldwide. This is set to benefit many industries, including manufacturing, transport, healthcare, and education.

7. Over time, countries have opened up ground-breaking possibilities for 5G services while still protecting the existing radio services. WRC-19 delivered on this goal and secured a pathway to 5G's future success in the agenda for WRC-23." (https://www.gsma.com/newsroom/press-release/gsma-wrc-19-opens-door-to-exciting-new-5g-services/). Spectrum demand for IMT continues to grow as mobile communication evolves, and WRC-19 recognised this by setting an agenda for the next WRC in 2023 that will consider the identification of additional mid and high frequency bands for varied used including IMT.

8. Globally, commercial 5G services are already operating in the mid-frequency spectrum in the 3 GHz range (from 3.3-4 GHz), providing a good balance of coverage and capacity. Increasing the globally harmonised spectrum in this frequency range at WRC-23 would boost 5G network performance, decrease deployment costs and realise significant economic benefits.

9. Spectrum can contribute significantly to a nation's GDP. Some studies have found that in countries with advanced information and communication technologies, the use of spectrum enabled an increase in GDP of about 3.4%. This contribution is attributed to spectrum enabling advances in several areas, including employment, technology, and investment in a wide variety of spectrum initiatives. If the pace of innovation around spectrum remains steady, it will provide more opportunities for countries to grow GDP and develop new sources of revenue[1].

10. Spectrum's revenue potential is just part of its importance, however. Spectrum is also the communications backbone for a country's crucial social and public services, and it offers a means of providing broadband services to underserved rural areas. Embracing the new era of the Fourth Industrial Revolution, spectrum will help to bridge the digital divide and streamline a digital economy and lifestyle for the future.

[1] Reference
The Coming Battle for Spectrum https://www.bcg.com/publications/2020/coming-battle-for-spectrum

Issues of concern to SACF

There are several issues on which SACF would like to express concerns over and which directly touch on its members.

Current Regulatory Framework not sufficiently forward-looking

11. Spectrum is one of the most critical resources for the ICT sector, and the general post-Covid-19 economic recovery. SACF thinks that it is crucial for the Authority to adopt a forward-looking approach in licensing of the spectrum. WRC-15 and WRC-19 identified several bands for IMT (including 5G). They include 24.25-27.5 GHz (Res. 242), 37-43.5 GHz (Res. 243), 45.5-47 GHz (Res. 244), 47.2-48.2 GHz (Res. 243) and 66-71 GHz (Res 241) for the deployment of IMT (5G) networks.

12. SACF acknowledges that not all the bands can be licensed simultaneously and urges the Authority to licence them on a priority basis. The priority can be determined by the maturity of the ecosystem (such as network infrastructure and devices), the channelling plans, the availability of investment, and others as the Authority would deem applicable. The SACF believes that much of the underlying work, such as the frequency migration plan, among others, ought to begin. SACF further expresses its interest to participate in this process.

Regulatory Certainty

13. The SACF is concerned that some bands that were earmarked for IMT were historically licensed through opaque processes, favouring some licensees over others. SACF urges that all licensing must be fair and transparent, allowing all eligible and interested parties to fairly compete for access to available spectrum.

14. Regulatory certainty is always important but more so in capital intensive sectors where very significant levels of investment are required. Therefore, it is imperative that processes are consistent, clear, fair, and transparent.

15. The SACF has highlighted several bands identified for IMT use that are yet to be licensed. We anticipate that demand will exceed supply in most bands although it is unlikely that this will be the case in all instances. We, therefore, urge ICASA to assess the demand for each band and then apply the most

appropriate licensing process. The processes must be consistent, clear, fair, and transparent. In the bands where demand exceeds supply, ICASA must apply a competitive process.

16. In addition to processes being clear, fair, transparent, and consistent, it is important that ICASA has a standard approach to issues so that no licensee is prejudiced over another. This especially clear in respect of licensee migration where a licensee for example was granted an incentive to migrate, while others were not despite having been in a similar position.

17. The SACF does not support the approach of incentivizing or granting concessions to licensees to migrate, as it may have the unintended consequence of encouraging squatting in bands in anticipation for a large payday.

18. Instead, we acknowledge that there the circumstances in respect of migration may differ therefore, the SACF would urge ICASA to create a framework for migration to clearly set out the rules which will enhance fairness, transparency, and consistency.

19. The necessity to expedite digital migration is clear, as is the speed and therefore, ICASA should publish regular updates with at least quarterly targets to be met.

Ineffective public consultation

20. Public consultation is a key element of any regulatory process and is explicitly enshrined in the constitution and founding legislation. It is a critical element of any regulatory, policy or legislative process to enable all affected stakeholders an opportunity to present its challenges, concerns and make proposals on envisaged solutions to address the identified challenges and concerns.

21. It is equally important that stakeholders have a clear understanding of the problem being cured as this would assist stakeholders proffer solutions.

22. The public consultation improves transparency and the quality of the regulations because of the diversity of ideas, solutions, and perspectives. Public consultations ought to be viewed on the same basis as the principle of network externalities, where every additional comment adds value to the collective and the process. Conversely, everyone input denied prejudices the process and collective by depriving the collective of the ability to consider the additional perspective that will shape the outcome.

23. It is imperative to draw the distinction between competitive and non-competitive processes as the approach to each would be different. The approach to a non-competitive public consultation would be more acquiescent because of the objective of the process.

24. A competitive process would of course be less flexible due to the potential prejudice to be suffered by participants in the process.

25. The integrity, fairness, transparency, and consistency of a competitive process must be sacrosanct to mitigate legal challenges. Legal challenges can never be eliminated but can be mitigated when the prospect of success is limited.

26. Notification and awareness of the process is essential for stakeholders to participate. Therefore, it is essential that the process and the timeframes are clear. Stakeholders cannot participate in a process that they unaware of or the timeframes are particularly short.

27. Meaningful consultation is premised on the ability of stakeholders to consider regulatory proposals and do the necessary scenario planning assessing the impact. This is a critical element of providing meaningful commentary. Therefore, the timing of the publications and processes is important.

28. While ICASA publishes an annual plan, the SACF urges ICASA to ensure a better spread of overlapping and similar categories of projects due to the limited resources of stakeholders. The most severely prejudiced stakeholders would be those with more limited resources.

29. The Authority should consider that some stakeholders do not have the capacity to respond to multiple public consultations at the same time. If there are multiple consultations at the same time, then the response times should be staggered over time while taking the public interest into account.

30. ICASA has recently adopted an unnecessarily harsh approach to receipt of submissions, requests for extensions despite the detailed reasoning and commentary periods which in our view significantly undermines the public consultation appearing to reduce it to a superficial consultation.

31. A standardisation of the processes and submission times would be more helpful and inclusive and as a result can only enhance the process and outcome.

Consistency in compensation for migration

32. The SACF understands that the Authority's position is that there will be no compensation for licensees affected by migration. RAIN (WBS) was however given an extra 5 MHz in the 2.6 GHz band for their in-band migration. However, a dissimilar approach is envisioned for the 900 MHz in-band migration where spectrum will be reclaimed from the migrating licensees without any compensation.

Use of Spectrum Sharing techniques

33. The SACF understands that spectrum is a scarce resource that requires efficient utilisation. This can be achieved using modern technologies that seek to optimise the use of the resource. Spectrum sharing, trading, and pooling can be useful tools to ensure the most effective and efficient use of assigned spectrum. However, it is important that this is done on a commercially agreed basis to prevent the undue prejudice to licensees.

34. A clear framework will protect all interested stakeholders and provide much needed regulatory certainty.

35. Spectrum sharing has been embraced across the world, including here in South Africa. SACF urges the Authority to fully embrace spectrum sharing on all applicable frequency bands to achieve the most efficient utilisation of the available spectrum.

Migration of Frequency Bands from FDD to TDD

36. Most of the IMT frequency bands are operating under FDD, which needs separate frequency bands/channels for uplink and downlink to allow full-duplex communication. This offers less efficient spectrum utilisation than TDD, which allows both uplink and downlink communication to occur within one frequency channel, by dividing it into time slots. Uplink and downlink communications are allocated different time slots within the same channel. This is most preferred for the bands above 2.1 GHz. SACF, respectively, urges that all frequency bands above 2.1 GHz operating under FDD technique be migrated to TDD technique.

Use of Active Antenna System (AAS)

37. Active Antenna Systems (AAS) use new technologies, e.g., Beamforming. The spectrum utilisation is much more efficient with this technology, as compared to other types of antennas. Additionally, 3GPP Technical Specification 38.104 proposes that the transmission counters of the new AAS base station are represented by OTA (Over-the-Air). The measurement conditions are defined as Total Radiated Power (TRP), not Effective Isotropic Radiated Power (EIRP). TRP is more accurate in assessing interference between 5G and other mobile systems.

The Current Spectrum Sharing Provisions are Unclear

38. The SACF has noted that the current spectrum sharing provisions are unclear in that they do not state who, what/which, when and where spectrum can be shared. This could be one reason why spectrum sharing has not been actively embraced in South Africa.

39. Section18(2) of the Authority Radio Frequency Spectrum Regulations 2015 states that *"The Authority may require a licensee to share an assigned frequency with other licensees",* thus allowing the Authority to use arbitrary criteria.

40. The Authority does not seem to have fixed rules and criteria for approving spectrum sharing agreements. It asks interested parties to submit applications when these entities approach it for clarity.

41. The SACF notes that in the UK an operator-initiated spectrum sharing arrangement has been implemented and is supported by Ofcom. It appears to address some of typical challenges in extending networks to rural areas including strengthening the business case which may be increasingly weakened by the growing migratory behaviour of South Africans. Nevertheless, the need for equitable connectivity to rural areas remains a national imperative. While the spectrum sharing project is still at its infancy and it is important to watch and see how it evolves and the lessons from this project could provide valuable insights in addressing rural connectivity in South Africa.

42. The obligations imposed during Telkom's exclusivity may provide valuable insights on the need to comprehensively study approaches adopted in other jurisdictions before implementation. We, therefore, urge ICASA to study this project.

43. There should be a standalone spectrum sharing regulation, or an amendment of the current provisions, that sets out the requirements for approval of spectrum sharing, the terms and conditions and applicable fees if any.

44. The SACF urges the Authority to consult from other regulators who have well-established frameworks on spectrum sharing.

Insufficient information publicly available about spectrum assignments

45. The SACF is concerned that there is limited information about spectrum assignments that is publicly available. This information is critical to stakeholders and is part of ICASA's mandate.

46. The SACF therefore urges ICASA to publish regular updates on the spectrum assignments. As there is limited public value in indicating the licensees to whom the spectrum has been assigned, we would therefore urge ICASA to publish updated assignments only. Linking them to licensees may present competition challenges.

47. Similarly, there is insufficient information publicly available about Digital Restacking Plans.

48. There was a recent news article (accessible via the link below) indicating that Sentech is restacking the digital dividend spectrum. However, there is no published plan to show what will be done and by when. SACF urges the

Authority to publish this digital restacking plan. (*https://mybroadband.co.za/forum/threads/sentech-begins-digital-dividend-restacking-in-northern-cape-and-north-west.1171986/*

Maximum Radiated Power Limit

49. The current Radio Frequency Spectrum Assignment Plans (RFSAPs) contain a maximum radiated power limit of 61dBm/5MHz EIRP. SACF notes that in the CEPT ECC Decision (11)06 in-block power limit is not obligatory, and if it is desired by an administration, a value not exceeding 68dBm/5MHz EIRP per antenna for non-AAS and 47dBm/5MHz TRP for AAS may be applied. Such more recent moves suggest that it may be prudent for the Authority to reconsider its position on EIRP and conduct further research into recent global developments, and then update the definitions of "maximum radiated power limits" in the related RFSAPs in the implementation of the migration process, which applies to the TDD bands 2300-2400 MHz, 2500-2690 MHz, 3300-3800 MHz, etc.

Service neutrality Vs Technology neutrality

50. The Electronic Communications Act (ECA) encourages the Authority to be technology neutral. In relation to radio frequency spectrum (RFS), the SACF understands this to mean that the Authority should grant licences that specify the type of service that can be provided e.g., Fixed or Mobile, without dictating the specific technology to be used by the licensee.
51. As we have pointed out in previous submissions there is a fundamental difference between service and technology neutrality. The ECA provides for technology neutrality.
52. Technology neutrality means **that technical standards designed to limit negative externalities** (e.g., radio interference, pollution, safety) should describe the result to be achieved, but should leave companies free to adopt whatever **technology** is most appropriate to achieve the result.
53. We understand refarming to mean that the technology for a specific band may change, for example from 4G to 5G but IMT, nevertheless.

Reclaim, migrate and re-license

54. However, once the allocation of a band changes, the spectrum must be reclaimed by ICASA, licensees in the band must be migrated out of the band and the spectrum must be licensed in a fair and transparent manner and within the prescribed framework.
55. Failure to do so has the potential of encouraging to licensees to prospect and hoard the spectrum until it becomes more valuable. This can never be ICASA's intention.
56. The SACF recommends that the Authority should consult on the principles of service and technology neutrality and develop clear guidelines to ensure transparency and fairness.

Frequency bands of interest to SACF members

450-470 MHz

57. SACF urges the Authority to expedite clearing of this band to allow licensing for IMT use.

606-694 MHz

58. SACF appeals to the Authority to consider licensing this band on a non-interference, non-protection basis, including for IMT.

3600-3800 MHz

59. It was widely anticipated that WRC-19 would have allocated this band to the Mobile Service on a primary basis. However, this decision was deferred to WRC-23 and the band was allocated to Mobile on a secondary basis in Region 1.

60. As a result, Satellite remains the primary use in this band.

61. Europe and the Middle East have been able to fast forward and use this band for IMT due to the relatively low number of satellite users and consumers in these bands. At the same time, SACF does appreciate that Africa, in general, has a considerably higher usage of satellite services. Despite this, South Africa does

not have a similarly high use of satellite services in this band compared to other African states.

62. SACF believes that the Authority has already started licensing broadband services in this band, albeit on a secondary basis. However, these licences were issued for fixed wireless access (FWA) services, as SACF understands it. This raises several questions for the SACF and our members, which include:
    - Are these licences temporary, in that they will be reconsider post WRC 23?
    - Following WRC-23, if the band is allocated to the Mobile service on a primary basis, will these FWA licensees be migrated out of the band?
    - Will the Authority then allow the transition from fixed use to Mobile for licensees currently licensed in these bands?
    - Will the Authority recover the spectrum and follow an adequately constituted competitive process, as SACF is aware that some of our members applied for spectrum in these bands and were not granted licences, nor were they refused licences either?

63. As this band is likely to be allocated to the Mobile service on a primary basis in the future, SACF urges the Authority to at least align with ITU Region 1 to allocate the band to the Mobile service on a secondary basis at this time and not wait for a primary allocation to mobile after WRC-23. This could be done to prevent interference, where licensees are required to coordinate access.
64. This becomes especially important to prevent undue prejudice to small licensees, should they invest. It would seem more prudent to instead pursue a sound, fair, transparent licensing process to mitigate undue prejudice and legal challenges.
65. Furthermore, the standards established for equipment in these bands are evidenced in Europe and the Middle East. The SACF understands that channelling arrangements are being developed.
66. Finally, SACF believes this will contribute to economic activity, particularly as it supports 5G services essential for 4th Industrial Revolution (4IR) economies.

Recommendation

67. The Authority should urgently provide clarity on the approach to licensing and whether it will be retaining or reclaiming the currently licensed spectrum.

1427-1518 MHz (L-band)

68. The L Band is a good coverage band with better propagation properties than the 1800 MHz band. For example, while it is a good coverage band, it is a complementary band used with other coverage bands.

69. SACF notes that the power limits assigned to this band should apply to outdoor applications and should be reduced for indoor applications as the probability of interference is limited.

70. SACF believes that a TDD configuration allows for more innovative, adaptive, and efficient spectrum use, allowing for adjustments and corrections based on current use case patterns.

71. "The requirement for standalone operation in the band (both UL and DL transmissions) has emerged in some other regions. (https://fundarc-comm.xgnlab.com/2019/02/the-need-for-globally-harmonised-5g.html) In the case of standalone 5G systems, a TDD access scheme is a potentially appropriate option, accommodating traffic asymmetry in the UL/DL directions with good potential for economies of scale.

72. SACF supports the release of the 1452-1492 MHz band for IMT. Additionally, we also encourage the Authority to release the 1427-1452 MHz and 1492-1518 MHz bands as soon as feasible to enable a significant block of spectrum in this band (91 MHz vs. 40 MHz).

73. While some regulators have already assigned this band for supplemental downlink (SDL – Band n75), the SACF expects that there may be a future migration to the more flexible Band n50+n51 arrangement. As such, the SACF recommends that the Authority should immediately assign the range 1432-1518 MHz in a Band n75 configuration, with a migration plan to the n50+n51 (1427-1518 MHz) TDD band plan. This would allow for use of 5G for downlink only, uplink only or uplink/downlink transmissions depending on the needs of the operators.

Recommendation

74. Harmonise the band for B75/N75 and get it ready for licensing while still gathering data and conducting research.

2500-2690 MHz (IMT2600)

75. In May 2020, the SACF participated in the Authority's consultative process on the IMT 2600 band FDD conversion to TDD. SACF welcomes the Authority's decision to amend the draft plan accordingly, and SACF believes that this will improve the spectrum efficiency in the band.

3300-3400 MHz

76. As SACF understands, the 3300 – 3400 MHz band was identified for IMT at WRC-15 but is yet to be implemented in the South African market. The network ecosystem for this band is still small but growing, supported by recent allocations in South America and South Asia. SACF believes that no barriers are prohibiting the licensing of this band.

77. The licensing of these bands sooner rather than later will create certainty and allow operators to roll out more efficiently and have less cause for replacing the equipment over the short to medium term. This will contribute to the national priorities reducing the cost to communicate and extending infrastructure ubiquitously.

78. In this regard, SACF urges the Authority to share its plans on preparing the band for licensing. The South African Communications Forum believes that such plans should include any migration plans, including the applicable timeframes. In instances where there will be coordinated usage, SACF urges the Authority to develop a database of the extent of radar/radiolocation use within the bands.

Recommendation

79. SACF recommends that the Authority license the 3300–3400 MHz band sooner rather than later and create or publish a database of current users together with its plans and associated timeframes for licensing.

4800-4990 MHz

80. This band was first identified for IMT use at WRC-15.

81. While the ecosystem is still in its developmental stages, SACF has noted that the period for developing the ecosystem is continually getting shorter. SACF anticipates this trend to continue as countries with large markets are beginning to licence this band.

82. SACF believes that the Authority should expedite the licensing of this band, particularly as this is considered an essential band going forward.

83. The South African Communications Forum urges the Authority to identify possible migration in the band. The migration plans, together with timelines, should be published.

Recommendation

84. Provide information and transparency on incumbents and begin to prepare the band for licensing as soon as possible.

24250-27500 MHz (26 GHz) & 37000-43500MHz (38 GHz & 42 GHz) bands

85. SACF notes the allocation of the 26.5-27.5 GHz band for mobile communication and that WRC-19 Resolution 242 and footnote 5.532AB identified this band for IMT.

86. The SACF believes it is essential to begin preparing this band for access. However, while it is important to start preparing the band for licensing, SACF recognises that the preparation of this band is likely to be a complex task due to the number of legacy users in the band. As a result, SACF believes that the band would need harmonisation. SACF, thus, urges the Authority to begin the licensing process as soon as possible.

87. Notwithstanding the challenges in the band, SACF believes that there are parts of the band that could be licensed sooner rather than later.

Recommendation

88. SACF urges the Authority to begin preparing the band for licensing with applicable timelines and the processes to be followed as information for the industry.

5925-7125 MHz (6 GHz)

89. According to the ITU, the data traffic consumption of 5G users is growing at a considerable speed, with the average monthly traffic per mobile user worldwide anticipated to reach 250 GB by 2030. In addition, 5G will be widely used in various vertical industry applications.

90. Given the above business requirements, the GSMA forecasts that each country will still need an additional 1-2 GHz mid-band spectrum by 2030 in addition to the refarming of the existing spectrum.

91. The upper 6 GHz band is potential golden capacity spectrum for 5G/6G and should follow the WRC-23 agenda item 1.2 process to study the possibility for IMT identification.

92. Beyond the 3 GHz & 4 GHz bands (which still suffer from legacy incumbent use), the next available capacity band for IMT is in the 6 GHz range.

93. When compared to the limited user connectivity of Wi-Fi (typically being constrained to users with alternative fixed access), the prospect of providing high capacity IMT services to large numbers of users is a more compelling proposition in a country such as South Africa that has very limited fixed access.

94. In regard to local Wi-Fi networks, there are other short-range alternatives for personal area networks such as such as WiGig in the 60 GHz band.

95. If the spectrum is to be used as a Mobile hotspot, the data traffic will be backhauled over the Mobile network's spectrum. Therefore, it would mean that there is duplicate use of spectrum in that traffic would be carried over the operator's spectrum while the Wi-Fi spectrum will merely act as a relay to the local network. This will be inefficient use of the spectrum resource.

96. For all these reasons, SACF urges the Authority to avoid a rushed decision on the allocation of the lower part of the 6 GHz band (5925-6425 MHz) to unlicensed use. With regards to the upper part of the band (6425-7125 MHz), SACF supports the consideration for mobile use.

Table 1: Frequency Bands of Interest to SACF members

Frequency Band	Prioritisation	Location in the Spectrum Framework		Motivation for the Prioritisation	
		Band Plan	**Migration Plan**	**Assignment Plan**	
IMT 700	Immediate	Completed	Completed	Completed Completed	March 2022 national Switch off **Publication of monthly status updates.** The SACF written submission requested quarterly plans, however the lack of readiness by broadcasters at the hearings demonstrated the need for more frequent updates.
IMT 800	Immediate	Completed	Completed	Completed	
IMT 2600	Immediate	Completed	Completed	Completed	Incorrectly reflected in the draft Band Plan. Needs to be reflected correctly.
3300 – 3400 MHz	Immediate	Completed	Completed	Begin as soon as is practicably possible.	Already licensed for non IMT applications. Identified for IMT usage at WRC 15. Equipment already deployed supports the use of these bands and there is a mature user terminal ecosystem that supports this band. Publish a database of current users for co-ordinated usage. Publish licensing timeframes.
3500 MHz	Immediate	Completed	Completed	Completed	

Frequency Band	Prioritisation	Location in the Spectrum Framework		Motivation for the Prioritisation	
		Band Plan	**Migration Plan**	**Assignment Plan**	
3600-3800 MHz	Medium-term – Post WRC-23	On the Agenda for WRC-23	Will follow WRC-23 processes	Will follow WRC-23 processes	Authority should urgently provide clarity on approach to licensing and whether it will be retaining or reclaiming currently licensed spectrum. Clear articulation of licensing process to be followed. The SACF's proposal is to reclaim, migrate and assign. Reallocation of the band planned for WRC-23. Identification of all prospective high demand IMT bands.
4800 – 4900 MHz	Medium-term	Update Band Plan – decided at WRC-19	Identify legacy users Begin consultation on migration plans	Begin as soon as is practicably possible. Financial year: 2022-23	Already identified for IMT at WRC-19.
L Band 1427-1518 MHz	Immediate	Update the Band Plan	Identify legacy users Begin consultation on migration plans	Begin as soon as is practicably possible.	SACF recommends that the Authority begins preparation for access to the band, while still gathering data and conducting research.

Frequency Band	Prioritisation	Location in the Spectrum Framework		Motivation for the Prioritisation	
		Band Plan	**Migration Plan**	**Assignment Plan**	
26, 38 & 42 GHz	Medium-term	Update the Band Plan as per WRC- 19 decision	Publish a database of legacy users to begin migration of the band. Grandfathering to be considered.	Begin as soon as is practicably possible.	Identified for IMT at WRC-19 Favours 5G (High bandwidth and low latency)
6425-7125 MHz (upper 6 GHz)	Long-term	Part of Agenda Item 1.2 of WRC- 23	Will follow WRC-23 processes	Will follow WRC-23 processes	The SACF notes with appreciation the Authority's support at ITU WP5D for identification of this band for IMT and its input contribution of a sharing study between IMT and incumbent services in the band. The Authority should collaborate with industry partners to cultivate the E2E IMT ecosystem of the 6 GHz band SACF also recommends adding a note to all sub-bands between 6425 MHz and 7125 MHz to indicate that this band is under consideration at WRC-23 for future IMT use.


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General comments

Licensing Process

97. SACF holds the position that:
    - The licensing processes must be clear, fair, transparent, and consistent;
    - The Authority should be explicit on its position concerning the status of spectrum licences when the use of the band changes from one service to another e.g., fixed to mobile. There is need for clarity on whether users retain the assigned spectrum or does the Authority reclaim the spectrum.
    - SACF's recommendation is to reclaim, migrate and assign through the appropriate process, following an assessment of demand.

Additional Comments

98. The Minister of Communications and Digital Technologies announced an analogue switch-off date of March 2022.
99. Broadcasters have indicated a lack of readiness to migrate from the IMT700 and IMT 800 bands. SACF appeals that this deadline should not be extended any further.
100. The Authority should develop and publish a strategy to fast-track migration as it is tied to the licensing of the critical high demand spectrum.

WRC 23 Agenda Items

- ICASA should include a note that highlights bands on the WRC-23 agenda.