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2018/01/18

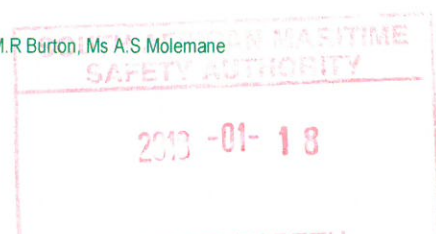
ATTENTION: Mr Manyapelolo Richard Makgotlho

RE- COMMENTS ON NOTICE REGARDING SPECTRUM ASSIGNMENT PLAN 156.4785 TO 156.5625 MHz.

1. Frequency allocation for this band is contained in ITU Radio Regulations of 2016, Appendix 18. The regulation for this band is thus prescribed in the appendix and the corresponding footnotes. In this allocation, the frequency allocated to the international distress and safety channel, channel 70 on 156.525 MHz, is a protected frequency, so are the guard bands around it. The transmission of distress and safety message uses Digital Selective Calling, a unique technique to ensure transmission and reception with responses to an emergency signal.
2. The notice issued in Government Gazette No. 41350, Notice 941 of 2017, spells out a purpose to re-assign this very important maritime band for other base and mobile use. Power calculations for base stations are approximately 25 to 30 watt, whilst mobiles are restricted to approximately 8 watt.
3. Of concern is the protection distances from the water shoreline coast of 50 kilometres. The previous protection distances were 200 Kilometres inland direction. Past experiences has proven that even this distance is not always appropriate given certain conditions for propagation.
4. Channel 70 is allocated for the purpose as indicate above. The Notice does not honour this allocation as made by the ITU. Channel 70 is used world-wide for Distress and Safety communications. International Maritime Organization manages the SOLAS convention. (Safety of Life at Sea). This channel is engraved as the basic Digital Selective Calling channel on VHF with automatic and semi-automatic transmitting capabilities built in equipment, to broadcast distress alerts from stricken vessels.
5. The process of implementation of channel 70 on the South African Coast for sea area A1 watch-keeping has started and is currently being rolled out. Most of the larger South African Ships and Fishing Vessels are already equipped with Channel 70 (DSC) for the purpose of safety of life at sea. The small craft will come on board during the 2018/2019 period to do the same.
6. Should these new allocations cause any interference, a large probability exist that lives will be lost, huge costs will be encountered for Search and Rescue. Coupled with the sinking of a ship, is the pollution issue. Cleaning up operations are extensive, and should be prevented at all cost. This frequency of 156.525 MHz is needed for the alerts and signals to establish initial contact and resolve all the issues, possibly preventing a disaster.

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7. Channel 10 and 11 with frequency allocations of 156.500 MHz and 156.550 are for use by inter ship communications and especially port operations in harbours. These are very important frequencies for use in the harbour regarding the safe navigation in ports of ships, fishing vessels, harbour tugs and pilot launches. Berthing crews need to manage the safe mooring operations of vessels, and interference free communications is needed with the ships for the effective administration thereof.
8. We urge you to re-consider this assignment plan, and make adjustments to embrace issues around maritime safety and honour the stipulations of Appendix 18 and the relevant footnotes, especially footnotes f and j.

Kind regards.


JS Arnold (Koos)
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