

Part A

General Comments of the Draft Update of the NRFP 2021

This section of SRAO's submission consist of general comments aimed at improving the quality and providing clarity of the draft NRFP2021. More details are included in the comments section of Annexure 1 to Part A of SRAO's submission.

SRAO would like to propose that in the future, either the Authority publishes several drafts of the draft update of the NRFP or develops plan together with interested stakeholders before draft publication. Some of the issues that are not clear on this draft publication may be significant and of material nature and important in informing stakeholder's response to the draft publication.

For example, in section 8 of the draft publication, the Authority provides a list of frequency bands used for Maritime Services. There are many Maritime allocations that are not included in the list, for example, the bands 14 – 19.95 kHz, 20.05 – 70 kHz, 1625 – 1635 kHz and many others are allocated to Maritime services on a primary basis. It is possible that the Authority's intention was to provide a list of Global Maritime Distress and Safety Systems (GMDSS). But, this simple omission informs how the stakeholder responds to the draft update of the NRFP.

In many instances, the draft NRFP2021 makes explicit allocations to services that are allocated through the Radio Regulations footnotes. There are instances where this is desirable, especially in allocations that makes explicit mention of SA in the footnote. But in many other cases, this is not desirable as it clutters the document and makes it very difficult to compare the plan with the Radio Regulations. This format was also considered in the development of the AfriSAP but the challenges were discovered during the meeting sessions. There are several instances, where the footnote does not mention if the allocation is secondary or primary and in other instances the draft NRFP allocates a service on a Primary basis when it is actually allocated on a secondary basis through the footnote. It is, therefore, proposed that unless if it is really necessary, the NRFP2021 follows the Radio Regulations. Care should also be exercised when deleting footnotes that are not applicable to SA. Footnotes that does not include SA but includes a neighbouring country should be retained to highlight a possible different use in one of our neighbours.

The draft NRFP2021 has several errors, that makes it difficult for stakeholders to make necessary comments in the time frame that is afforded. In the example for the allocation below,

ITU Region 1 allocations and footnotes	South African Allocation and footnotes	Typical Applications	Additional information
14 – 19.95 kHz FIXED MARITIME MOBILE 5. 57 5.55 5.56	14 – 19.95 kHz FIXED MARITIME MOBILE 5. 57 STANDARD FREQUENCY AND TIME SIGNAL 5.56	Maritime Mobile communication Inductive Loop Systems (9 – 135 kHz) SRDs – inductive short-range radiocommunication (9 kHz-135 kHz)	Radio Frequency Spectrum Regulations as amended (Annex B)

The allocation above is copied from the draft NRFP2021. The Authority provided the colour coding in page 5 of the draft NRFP2021 and yellow signifies general changes between RR 2016 Edition and RR 2020 Edition. But the Radio Regulations 2020 did not make any changes to this allocation, it looks exactly the same as the Radio Regulations 2016. The colour coding, editorial errors, table of frequency allocation missing other lines to separate adjacent allocations and the many changes that are done on the footnotes make it very difficult to read the document and respond appropriately within the timeframe provided.

SARAO, therefore, proposes that the Authority present the table of frequency allocation as provided in Annexure 1 to Part A. The table (Annex 1) proposes that the Table of Frequency Allocation to be aligned with the ITU-R Region 1 allocation as much as possible and without unjustified deviations. It is proposed that services permitted for use through footnotes, remains in the footnote and not allocated separately as it has been done in the draft NRFP2021. The table as it is in the draft NRFP2021 contains onerous details, where perhaps, readers of the document can be referred to a separate publication.

Comparing the draft NRFP2021 with other international best practices, columns four, containing general comment should be used to give further clarity, but column 3 for typical application, should remain fairly simplistic giving only the service/application being used while column 1 and column 2 should contain only basic information relating to the allocation.

SARAO has updated the draft NRFP2021 and attached the update as Annexure 1 to this Part A. However, due to time constraint, it could only be done in detail up to 1000 MHz. Beyond 1000 MHz only column 1 and column 2 of the NRFP2021 has been updated, with exceptions to bands allocated RAS. In cases of RAS, SARAO has also provided proposed updates to column 3 and column 4 of the draft NRFP, up to 50 GHz.