



The Independent Communications Authority of South Africa  
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Attention:  
Mr Davis Kgosimolao Moshweunyane  
Email: dmoshweunyane@icasa.org.za  
And  
Mr Manyaapelo Richard Makgotlho  
E-mail: rmakgotlho@icasa.org.za

Dear Mr. Moshweunyane and Mr. Makgotlho

**Re: Written Submission on National Radio Frequency Plan**

This submission is made by the South African Radio Astronomy Observatory (SARAO) in response to the invitation to provide written representations on the “Draft National Radio Frequency Plan 2025”. SARAO hereby request an addition of section 5.7 regarding the registration of the SKA-Mid telescope in South Africa on the ITU Master International Frequency Register (MIFR).

The establishment of radio-quiet zones such as the one for MeerKAT and SKA-Mid telescope is sufficient to ensure protection from interference from transmitters operating within national borders. However, for protection from international radio transmissions such as planes, satellites, and High-Altitude Platform Stations (HAPS) that may cross borders, MIFR recognition is needed.

The MIFR registration also recognizes SKA-Mid’s entire frequency range, including the bands not traditionally reserved for radio astronomy but that are still needed for breakthrough science. The timing of the recognition could not be better, considering the rapid developments of satellite systems in Low Earth Orbit and the increasing global interest in the use of HAPS.

Kind regard

Selaelo Matlhane  
Spectrum & Telecoms Manager  
South African Radio Astronomy Observatory (SARAO)

[www.sarao.ac.za](http://www.sarao.ac.za)

The South African Radio Astronomy Observatory (SARAO) is a National Facility managed by the National Research Foundation and incorporates all national radio astronomy telescopes and programmes.