

To

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Dear Davis and Richard

Thank you for the second draft of the Draft National Radio Frequency Plan 2025. The SARL appreciates the amount of work you have put into the second draft and congratulates you on a project well executed

The SARL would like to participate in the public hearing on 15 and 16 January 2026 and herewith provide information about the points we would like to raise on behalf of the Radio Amateurs in South Africa

Pre-amble

To facilitate the reading and discussion of our submission, we have included extracts of the ITU Radio Regulations (2024)

1.56 *amateur service*: A *radiocommunication service* for the purpose of self-training, intercommunication and technical investigations carried out by amateurs, that is, by duly authorized persons interested in radio technique solely with a personal aim and without pecuniary interest.

1.57 *amateur-satellite service*: A *radiocommunication service* using space stations on earth satellites for the same purposes as those of the *amateur service*

ARTICLE 25 AMATEUR SERVICES

SECTION I – AMATEUR SERVICE

25.1 § 1 Radiocommunication between amateur stations of different countries shall be permitted unless the administration of one of the countries concerned has notified that it objects to such radiocommunications. (WRC-03)

25.2 § 2 1) Transmissions between amateur stations of different countries shall be limited to communications incidental to the purposes of the amateur service, as defined in No. **1.56** and to remarks of a personal character. (WRC-03)

25.2A 1A) Transmissions between amateur stations of different countries shall not be encoded for the purpose of obscuring their meaning, except for control signals exchanged between earth command stations and space stations in the amateur-satellite service. (WRC-03)

25.3 2) Amateur stations may be used for transmitting international communications on behalf of third parties only in case of emergencies or disaster relief. An administration may determine the applicability of this provision to amateur stations under its jurisdiction. (WRC-03)

25.4 (SUP - WRC-03)

25.5 § 3 1) Administrations shall determine whether or not a person seeking a licence to operate an amateur station shall demonstrate the ability to send and receive texts in Morse code signals. (WRC-03)

25.6 2) Administrations shall verify the operational and technical qualifications of any person wishing to operate an amateur station. Guidance for standards of competence may be found in the most recent version of Recommendation ITU-R M.1544. (WRC-03)

25.7 § 4 The maximum power of amateur stations shall be fixed by the administrations concerned. (WRC-03)

25.8 § 5 1) All pertinent Articles and provisions of the Constitution, the Convention and of these Regulations shall apply to amateur stations. (WRC-03)

25.9 2) During the course of their transmissions, amateur stations shall transmit their call sign at short intervals.

25.9A § 5A Administrations are encouraged to take the necessary steps to allow amateur stations to prepare for and meet communication needs in support of disaster relief. (WRC-03)

25.9B § 5B An administration may determine whether or not to permit a person who has been granted a licence to operate an amateur station by another administration to

operate an amateur station while that person is temporarily in its territory, subject to such conditions or restrictions it may impose. (WRC-03)

Section II – Amateur-satellite service

25.10 § 6 The provisions of Section I of this Article shall apply equally, as appropriate, to the amateur-satellite service.

25.11 § 7 Administrations authorizing space stations in the amateur-satellite service shall ensure that sufficient earth command stations are established before launch to ensure that any harmful interference caused by emissions from a station in the amateur-satellite service can be terminated immediately (see No. **22.1**). (WRC-03)

Technology developments have also impacted on Amateur Radio.

As technology has developed so has the amateur service with a current greater emphasis on technical investigations as set out in 1.56 of the definition. This also requires a fresh look as some of the power limits still in the Radio Frequency plan. In term of 25.7 of the regulation this paper will make recommendations for consideration by ICASA before the final plan is gazetted.

135.7 – 137.8 kHz Footnote 5.67A limits the power to 1-watt eirp

472-479 kHz Footnote 5.80 not applicable in South Africa. 5.80A covers the power restriction in countries at least 800 km away from a list of countries. As South Africa meets that criteria 5Watt eirp is permitted.

As the transmit power of stations operating on the 135.7 and 472 kHz bands will not impact on other countries, the SARL proposes that 20dBw is allowed, which is the power limit on amateur bands where the allocation is secondary. The aim is to encourage more experimentation on these two bands, as envisaged in the definition of Amateur Radio in 1.56

1810 -1850 kHz Footnotes 5.98 5.99 5.100

1850 – 2000 kHz Footnotes 5.92 5.103

Various power limits are indicated for different areas in footnotes 5.2 5.96 and 5.100. The SARL proposes that the power limit on 1810 – 2000 kHz is set at 20 dBW as in annexure I of the 1995 Radio Regulations Gov Gazette 38641

430 – 440 MHz

There are many footnotes pertaining to this band which have little impact on Amateur Radio except the ISM allocation 433.5 – 434.79 MHz. According to annexure B3 of the 1995 Radio Frequency Regulations the power limit is 10 mW. Equipment freely available in South Africa operates on 5 watt and is not programmed to operate within the frequency spectrum for ISM. Many owners of the equipment operate outside the

ISM band. We understand that this is an enforcement issue and not a spectrum issue. However, it is a protection issue for which ICASA as the regulator is responsible, hence we are bringing it to your attention.

24.0 - 24.05 GHz Notes and comments should refer to Annexure I

24.05 – 24.25 GHz Notes and comments should refer to Annexure I

We look forward to the opportunity to further discuss our contribution to the final plan,

Your sincerely