Second Draft National Radio Frequency Plan 2025

11 December 2025

Contents

1. Introduction

1.1. SENTECH thanks the Independent Communications Authority of South Africa (ICASA) ("Authority") for the opportunity to make a further submission on the *Second Draft National Radio Frequency Plan 2025*, published in Government Gazette No.53637 on 07 November 2025 ("2nd Draft NRFP").

1.2. SENTECH's further submission should be read with the company's inputs on the *Draft National Radio Frequency Plan 2025*, published in Government Gazette No.52449 on 04 April 2025 and the attached file in Annexure A of this document.

2. Commercialisation of Digital Sound Broadcasting

2.1. The delay in ICASA announcing a commercialisation date for Digital Sound Broadcasting (DSB) in South Africa creates material uncertainty across the whole DSB ecosystem — slowing investment, delaying roll-out of multiplexes and consumer uptake, keeping analogue spectrum congested, and constraining new entrants and service innovation.

2.1.1. Without a commercialisation date, broadcasters and infrastructure providers (e.g., Sentech) cannot plan capex, bids for multiplex capacity, or rollout schedules with confidence, which discourages investment in transmitters, encoders, and new services. This slows the move from pilots/trials to paying services.

2.1.2. Manufacturers/retailers are reluctant to import and stock DAB/DAB+ or other DSB receivers at scale if there's no definite launch date; consumers then lack affordable receivers, further depressing uptake. Trials and limited rollouts fail to reach the scale needed to create a receiver market.

2.1.3. DSB was meant to improve spectral efficiency; delay means continued reliance on analogue FM/AM, keeping the spectrum congested and limiting capacity for new services or the release of "digital dividend" opportunities. ICASA's objective in the DSB regulations was partly to improve spectrum management, but delay undermines that.

2.1.4. Community and niche broadcasters expecting DSB as a route to more affordable carriage or multi-service capability remain constrained. An analogue scarcity previously limited new licences; DSB commercialisation was a path to expand services. Delay keeps barriers high.

2.1.5. DSB enables multimedia data services, targeted information, multilingual streams, emergency alerts and ensemble-level services. Uncertainty prevents developers, public-service broadcasters and third-party app/service providers from building DSB-dependent products.

2.1.6. Other regulatory processes that depend on a DSB timeline (national RF plans, multiplex allocation procedures, technical advisory groups like DTAG referenced in the regulations) are harder to finalise or implement. ICASA's regulations explicitly provide structures that presume an effective date and commercial roll-out.

2.1.7. Delayed job creation in installation, content production, receiver retail, and platform services; deferred public-interest benefits (e.g., better emergency broadcasting, more local content) that DSB could enable at scale.

2.2. The Authority is not enabling terrestrial broadcasting to become competitive; instead, the slow announcement of the commercialisation of DSB is hamstringing the industry. ICASA, as a matter of urgency, must publish a clear, time-bound roadmap or milestone schedule (even if phased). This reduces uncertainty more than silence. Identify pilot → commercial dates, multiplex award process, and consumer awareness programs. Fast-track a DTAG (as provided in the regs) to publish technical and commercial guidance.

2.3. The delay does not just postpone new radio services — it freezes investment, retards device market formation, prolongs spectrum inefficiency, and keeps new entrants and social benefits waiting. The single most effective remedy is regulatory clarity: even a phased roadmap with firm milestones and published multiplex/allocation rules will unlock industry planning and speed adoption.

3. Terrestrial Broadcasting

3.1. When finalising the bands allocated to terrestrial television broadcasting in the NRFP, the Authority must be acquainted with the North Gauteng High Court, Pretoria, judgement, namely: E.TV (Pty) Limited and Others v Minister of Communications and Digital Technologies and Others (2025/008928) [2025] ZAGPPHC 321 (27 March 2025).

4. Registration of Satellite Receiver

4.1. The Authority must develop a platform for the registration of satellite receivers.

4.2. The current online spectrum platform is designed for spectrum licence amendments, renewals and new applications. Additionally, the platform has historically proven unreliable.

4.3. It is also important to know that, as part of the bi-annual compliance requirements, SENTECH does submit information on its network.

5. Radio Frequency Spectrum Assignment Plans

5.1. SENTECH requires clarity from the Authority regarding the proposal to develop Radio Frequency Spectrum Assignment Plans (RFSAP) in broadcasting bands.

5.2. The Authority has delayed announcing the commercialisation of DSB, despite the publication of Regulations in April 2021.

5.3. What “highest value uses” is the Authority considering and on what basis?

6. Conclusion

6.1. SENTECH thanks the Independent Communications Authority of South Africa (ICASA) for the opportunity to provide this further submission on the Second Draft National Radio Frequency Plan (2nd NRFP).

6.2. The central theme of this submission is the urgent need for regulatory clarity and decisive action to unlock investment, enhance spectrum efficiency, and enable digital broadcasting services in South Africa.

6.3. The primary concern remains the delay in ICASA announcing a commercialisation date for Digital Sound Broadcasting. This delay creates material uncertainty across the entire DSB ecosystem, constraining new entrants, slowing investment, and delaying the rollout of multiplexes and consumer uptake. Without a firm date or a clear, time-bound roadmap, investment in transmitters, encoders, and new services is discouraged, and manufacturers/retailers are reluctant to stock affordable DSB receivers. This prolongs reliance on congested analogue FM/AM spectrum, undermining ICASA's objective to improve spectrum management. Therefore, ICASA must, as a matter of urgency, publish a clear, time-bound roadmap, including phased dates for commercial roll-out and the multiplex award process.

6.4. Terrestrial and Spectrum Management Issues: SENTECH highlights several specific areas requiring the Authority’s immediate attention:

6.4.1. Terrestrial Television Broadcasting: The Authority must take cognisance of the North Gauteng High Court judgment (E.TV (Pty) Limited and Others v Minister of Communications and Digital Technologies and Others, ZAGPPHC 321) when finalising the bands allocated to terrestrial television broadcasting in the NRFP.

6.4.2. Spectrum Assignment Plans: Clarity is required regarding the proposal to develop Radio Frequency Spectrum Assignment Plans (RFSAP) in broadcasting bands, specifically concerning what the Authority considers to be "highest value uses" and the basis for this determination.

6.4.3. International Framework: SENTECH advocates for the explicit inclusion of the ITU Radio Regulations Board (RRB) due to its vital role in interpreting and overseeing international radio-frequency spectrum usage and satellite orbits.

6.4.4. Spectrum Consistency and Protection: Clarity is sought on the primary and secondary allocation of spectrum, particularly within the 3800-4200 MHz band, where proposed Dynamic Spectrum Assignment (DSA) regulations appear inconsistent with existing national frequency plans. Furthermore, SENTECH seeks the inclusion of relevant ITU RRB Rules of Procedure (RoP) for the 3400-3800 MHz band to ensure consistent application of coordination requirements, which is essential to protect satellite earth stations.

6.4.5. Service Distinction: Concerns are highlighted regarding the distinction between "Land Mobile Services" and "Mobile Services" within the context of DSA for broadband services.

6.4.6. Satellite Receiver Registration: The Authority must develop a dedicated, reliable platform for the registration of satellite receivers, as the current online spectrum platform, designed for licensing functions, has historically proven unreliable.

6.5. In conclusion, regulatory clarity, particularly a phased roadmap with firm milestones for DSB commercialisation, is the single most effective remedy to unlock industry planning, speed adoption, and ensure the optimal management of the national radio frequency spectrum.

7. Annexure A

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