

NOTICE REGARDING THE SECOND DRAFT RADIO FREQUENCY SPECTRUM ASSIGNMENT PLAN FOR THE FREQUENCY BAND 825 TO 830 MHz AND 870 TO 875 MHz FOR PUBLIC CONSULTATION

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Table of Contents

1. Introduction.....	3
2. SENTECH's previous submissions	3
3. Studio transmitter links (STLs)	3
4. SENTECH's preferred outcome	4
5. Conclusion	4

1. Introduction

SENTECH thanks the Independent Communications Authority of South Africa (“Authority”) for the opportunity to make a submission on the *Notice Regarding the Second Draft Radio Frequency Spectrum Assignment Plan for the Frequency Band 825 to 830 MHz and 870 To 875 MHz* (“IMT850 Notice”) Government Gazette No. 41082, as published on 1 September 2017. SENTECH further indicates its willingness to participate in any hearings that the Authority may hold on the matters raised in the draft regulations.

2. SENTECH’s previous submissions

SENTECH would like to bring to the attention of the Authority that the company has without success sought to address issues and resolution to proposals requiring the migration of studio-transmitter-links (STLs) from the 800 MHz band. SENTECH has been making submissions to the Authority since December 2012 and there has not been any concrete response from the Authority. Due to this lack of response SENTECH has, for the last four (4) financial years, been unable to strategise on the future of the STL network. The company has also been burdened with refreshing equipment that is likely going to be replaced prior to end-of-life, to ensure compliance with service-level-agreements (SLAs) and *Compliance Procedure Manual Regulations*. Furthermore, SENTECH may not be able to budget for the migration of STLs in the 2018/19 financial as the matter is yet to reach its regulatory conclusion.

3. Studio transmitter links (STLs)

In terms of the *Frequency Migration Regulation and Frequency Migration Plan*, as published on 3 April 2013 Government Gazette, the Authority is yet to publish the Radio Frequency Spectrum assignment Plan (RSFAP) and time frame for the migration of STLs. As stated in previous submissions, SENTECH operates STL links in the range of 802 – 855 MHz for terrestrial sound broadcasting services.

Though the Authority has previously hinted on the use of the frequency band 2025 – 2110 MHz, there has been no regulatory framework linked to the band for STLs. In the absence of confirmed current usage of the band, it is unclear how STLs are going to be accommodated.

SENTECH has previously estimated that it will require approximately 3 years to successfully complete the STL migration, taking into consideration the resource requirement for DTT-to-DTT migration. The company is currently finalising preliminary site surveys of existing sites to determine scope for STL migration. SENTECH was hoping to coincide the STL migration with the DTT-to-DTT migration.

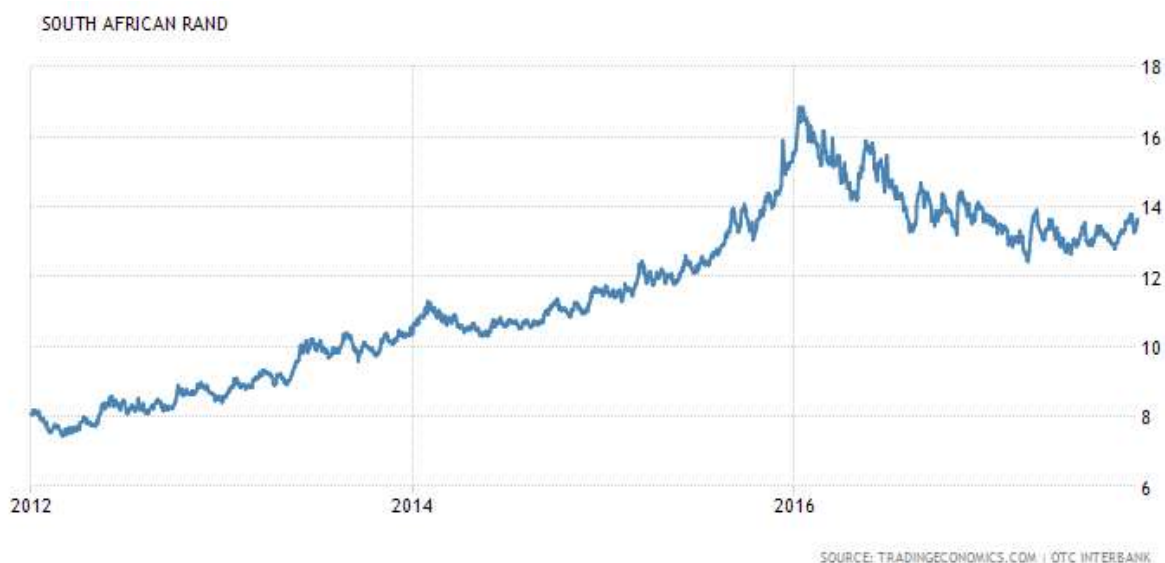
The following activities are awaiting the finalisation of RFSAP for STLs, *inter alia*:

- Determining the number of links required;
- Budgeting based on the scope STLs;
- Publication of a tender (RFP and Q) for STLs;
- Ordering of equipment / installation material;

The Authority is requested to take note that SENTECH also leases infrastructure from mobile operators for terrestrial sound broadcasting signal distribution. The company will be faced with a challenge of space, as space on most of the infrastructure is limited.

4. SENTECH's preferred outcome

SENTECH is simply asking for fairness from the Authority. The company requests the Authority to immediately finalise the RSFAP for STLs as this matter has been in discussion for more than four (4) years. The longer it takes to discuss and conclude on the issue of STLs, the more expensive the migration of services becomes. The graph below illustrates the pattern of rand/dollar exchange for the last five (5) years.



5. Conclusion

SENTECH thanks the Authority again for the opportunity to make a submission on the IMT850 Notice.