



19 June 2026

To: RRamendments@icasa.org.za

Cc: mmchunu@icasa.org.za

The Independent Communications Authority of South Africa
350 Witch-Hazel Avenue, Eco Point Office
Park Eco Park, Centurion
South Africa

Attention: Mr. Mandla Mchunu-Project Manager

Dear Sir,

RE: DRAFT AMENDMENT OF THE RADIO FREQUENCY SPECTRUM FEES REGULATIONS, 2010 IN TERMS OF THE ELECTRONIC COMMUNICATIONS ACT, 2005 (ACT NO. 36 OF 2005)

Telesat is grateful for the opportunity to comment on the proposed draft amendment. We commend this proactive approach aimed at aligning the fee framework with contemporary and emerging technological trends in satellite communication for enhanced regulatory responsiveness and market competitiveness.

We support the initiative that the fee structure must ensure that South Africa remains an attractive destination for satellite operators. Hence, our comment is informed by our desire to service the South African market through our Telesat Lightspeed system <https://www.telesat.com/leo-satellites> which will further revolutionize the provision of high-capacity, high-speed, and low-latency broadband connectivity on a global scale.

Telesat Lightspeed non-GSO constellation will begin global services in the first quarter of 2028 with an initial 156 satellites in low Earth orbit at an altitude of 1,335 km. Telesat also plans to add satellites as demand grows up to 300. The system will operate exclusively in Ka-band and will deliver fiber quality throughput (multiple Tbps of usable capacity with global coverage, Gbps links, low latency) across the globe. Furthermore, it is deemed a future-proof solution for backhaul cellular/5G traffic and will provide high-speed broadband access to rural and remote communities, planes, ships, enterprise and Government via local providers (i.e. not directly to end customers) for a more sustainable ecosystem.

Our comments on the Draft Amendment are as follows:

1. Telesat suggests that additional information should be provided on the value and implementability of the new SEC factor in the newly proposed formula in Section 3.1 to replace the existing hub station formula.
2. Telesat would like to highlight a peculiar feature of NGSO hub stations, which typically consist of more than one antenna. While each identical antenna will be tracking a different satellite at any one time, the overall range of pointing angles, operating frequencies and power will be within the same envelope. In other words, additional antennas do not significantly add to the spectrum denial of one. As such, Telesat suggests that, in this case, a single spectrum fee should apply for multiple identical antennas belonging to a single gateway, operating within the same satellite system and the same frequency range. This approach is already implemented in many countries for licensing NGSO gateway stations.

Thanking you in anticipation of your cooperation.

Please be assured of our esteemed regards.

Yours Sincerely,



Obiora OFFOR
Regional Director-Africa
Spectrum Policy and Market Access

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