ICASA Public Consultation

Draft Update of the National Radio Frequency Plan

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Telkom

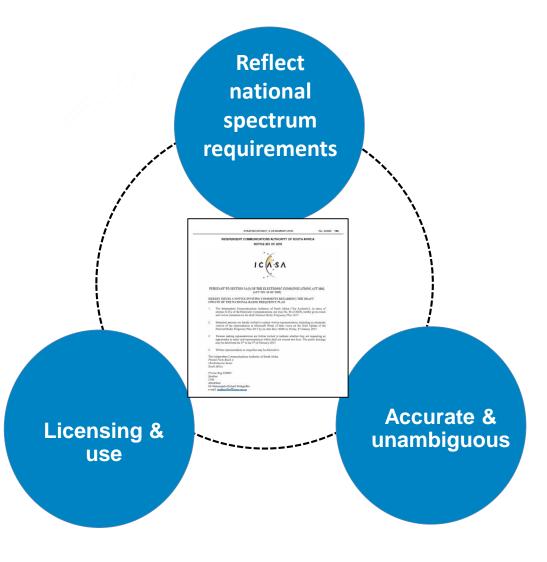


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1. Importance of the NRFP

Why do we need to get this right?

- The NRFP is the most critical document in the spectrum domain and underpins the current and future use of the radio frequency spectrum, which is shared between more than 40 radiocommunication services.
- All decisions pertaining to the use and licensing of spectrum stems from the NRFP.
- An ambiguous or technically inaccurate NRFP will inevitably lead to downstream problems as far as the licensing and utilisation of spectrum is concerned.
- Potential downstream issues include, litigation, financial harm, network and service disruptions and compromised international relations.



Issues to be Considered

Development of Frequency Migration Plan

- The radio frequency migration plan is an integral part of the NRFP.
- It is not clear how and when the possible new frequency migrations, for example, as a result of WRC-15 decisions, will be addressed.
- Should be developed together.

Editorial Corrections

- Misaligned entries between the various columns
- Duplicate entries
- Unqualified info added
- Incorrect references
- Inconsistent entries
- Changes to NRFP-13, which were not highlighted (using green, yellow or red)

Reference to CRASA Documents

- The update to the NRFP makes several references to CRASA guidelines and frameworks.
- In principle no objection but purpose and legal status need to be clarified.
- Out-of-date documents

General Amendments

- Certain proposed amendments are very complex and must be preceded by extensive consultation, debate and technical and operational clarification.
- Efficient and orderly spectrum use, avoidance of interference, certainty, etc. to be compromised.

 Ka-band satellite systems are available over South Africa and ICASA licensed same. Use of Ka-band satellite, coordinated and uncoordinated, to be added to the NRFP. Associated frequency sharing and coordination procedures required to avoid harmful interference.
 The use of UAVs (unmanned aerial vehicles) or drones on a shared basis in the 350 MHz band is unproven. Sharing between UAVs and existing systems may be problematic and requires further technical and operational assessment to ensure that these can operate without harmful interference.
 Updated NRFP proposes the use of the band 3600-3800 MHz for BFWA applications in addition to the current FS PTP and FSS applications. Frequency coordination procedures and sharing criteria to ensure that the future use of this band between FSS, BFWA and FS PTP are yet to be developed.

3. Band Specific Issues (non-exhaustive) (2/2)

DECT band used for IMT	 The draft NRFP proposes the use of the band 1880-1900 MHz for IMT. Sharing with DECT FWA and DECT cordless telephones have not been proven and needs further investigation.
FS in the band 2.3-2.5 GHz	 ICASA proposes the use of the band 2300-2400 MHz paired with 2400-2500 MHz for fixed links. This pairing is in conflict with existing pairing as per Rec. F.746 Fixed links must migrate from the band 2300-2450 MHz pending feasibility study.
2285-2300 MHz for BFWA	 ICASA identified the band 2285-2300MHz for BFWA Adjacent band compatibility, in band sharing, TDD synchronization, etc. must be considered prior to this band being used for BFWA.

4. Proposed Way Forward

- Supporting technical documentation, such as Frequency Migration Plan, Radio Frequency Spectrum Regulations, Radio Frequency Spectrum Assignment Plans, etc. are required in many cases.
- The Authority is requested to publish a reworked second draft NRFP-17 to allow industry further opportunity to asses final plan, including those comments received through written submissions.
- Further consultation is required on certain new complex proposals.



