

Regulatory Affairs and Government Relations
61 Oak Avenue, Highveld,
Techno Park, Centurion 0157,
Private Bag X148, Centurion 0046
T: +27 12 311 3598
F: +27 12 311 3314
E: Siyabonga@telkom.co.za

28 April 2022

Mr. Manyapelo Richard Makgotlho
Independent Communication Authority of South Africa
Dr Ivy Matsepe-Casaburri Building
350 Witch-Hazel Avenue
Eco Point Office Park
Eco Park
CENTURION

Via email: rmakgotlho@icasa.org.za
Cc: chairperson@icasa.org.za

Dear Mr Makgotlho

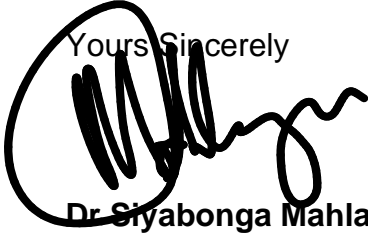
RE: TELKOM'S ADDITIONAL SUBMISSION PERTAINING TO THE AUTHORITY'S NOTICE REGARDING ITS INTENTION TO CONDUCT AN INQUIRY INTO THE LONG-TERM SPECTRUM OUTLOOK

The Authority conducted public hearings pertaining to its inquiry into the long-term spectrum outlook, as published in Government Gazette 45690 (Notice 738 of 2021), dated 24 December 2021 ("**spectrum outlook**") on 13 and 14 April 2022.

Telkom SA SOC LTD ("**Telkom**") presented to the Authority at the public hearings on 14 April 2022. During its presentation, the Authority provided Telkom with an opportunity to provide additional input on Telkom's submission pertaining to the issue of "alignment between documents" as it relates to the IMT bands addressed in the spectrum outlook and the draft implementation of the radio frequency migration plan and the IMT Roadmap (GN 739, GG45690, 24 December 2021) ("**draft implementation plan**"). Telkom was requested to submit its additional comments within seven (7) working days, i.e. before 28 April 2022.

Telkom's additional input on the issue raised by the Authority is contained in Annexure A.

Yours Sincerely



Dr. Siyabonga Mahlangu

Group Executive: Regulatory Affairs and Government Relations

Annexure A: Telkom's additional input on the question raised during the public hearings

Question:

1. Telkom to clarify or provide additional inputs on the issue of “*alignment between documents*” where Telkom noted that there is misalignment between the IMT bands listed in the spectrum outlook notice versus that listed in the draft implementation of the draft implementation plan.

Response:

2. Telkom's comment regarding the above is with reference to question 18 in the spectrum outlook. Q18 reads: “*What are your views on reallocating the following bands for IMT over the next years?⁴⁴*”. The Authority then listed several frequency bands as “*Table 3: List of possible IMT bands...*”. (own emphasis)
3. Both the spectrum outlook and the draft implementation plan were published for public comment on 24 December 2021. Whereas the draft implementation plan addresses many IMT bands, only some of these are listed in the spectrum outlook question. This question seeks views on the “reallocation” of bands as “possible” IMT bands.
4. To highlight the point made by Telkom, we refer to three bands namely 450-470 MHz, 3300-3400 MHz, and 3400-3600 MHz, which are listed in the spectrum outlook.
 - a. 450 MHz: The decision to use this band for IMT has already been made. This is reflected in the radio frequency spectrum assignment plan for the IMT450 band as well as in the National Table of Frequency Allocations. In the draft implementation plan, the band is highlighted as “Priority 4” in terms of bands to be used for IMT.
 - b. 3300-3400 MHz: The use of this band for IMT is contained in the National Table for Frequency Allocations (both NF9 and the Frequency Allocation Table under “Typical Applications”). In the draft implementation plan, the band is highlighted as “Priority 2” and reflected as “High Priority Urgent” in terms of bands to be used for IMT.

- c. 3400-3600 MHz: This band is already assigned to licensees and was included in the recently concluded spectrum auction where the available spectrum was licenced (except for the spectrum set-aside for the WOAN). The Authority prescribed a radio frequency spectrum assignment plan for this band (IMT3500) and the use of the band for IMT is also reflected in the National Table of Frequency Allocations.
5. Therefore, where these bands are seemingly already identified for IMT through various documents, the spectrum outlook requests views on the “reallocation” of the band for “possible” IMT, which seemingly goes contrary to decisions already made through other documents that these bands will be used for IMT in South Africa.
6. In addition to the above, Telkom’s comment was based on the following:
 - The inclusion of the specific bands in the spectrum outlook question, while excluding many other IMT bands included in the draft implementation plan, is not evident to Telkom.
 - The reference to the ITU Q&A (footnote 44) in the spectrum outlook is also not clear as the listed IMT bands in the spectrum outlook question is not aligned with the ITU Q&A listed bands.
 - Both the spectrum outlook and the draft implementation plan was published for consultation on the same day, which further clouded the matter.
7. Therefore, Telkom’s request that the Authority aligns all documents dealing with the issue of IMT bands so as not to create any uncertainty in the industry as to the future use of these bands.