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11 December 2025

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Dear Mr Moshweunyane and Mr Makgotlho

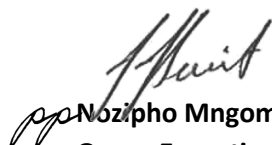
**RE: TELKOM SUBMISSION PERTAINING TO THE 2<sup>ND</sup> DRAFT NATIONAL RADIO FREQUENCY PLAN 2025**

Telkom SA SOC Pty Ltd ("**Telkom**") thanks the Independent Communications Authority of South Africa ("**ICASA**" or "**the Authority**") for the opportunity to provide comments on the second draft National Radio Frequency Plan 2025, as published on 7 November 2025 in Government Gazette 53637, under Notice No. 3585 of 2025 ("**2<sup>nd</sup> draft Frequency Plan**").

Interested persons were invited to submit written representations on the 2<sup>nd</sup> draft Frequency Plan by no later than 17h00 on Thursday, 11 December 2025.

Telkom requests an opportunity to make oral representations on the 2<sup>nd</sup> draft Frequency Plan at the public hearings scheduled for 15 to 16 January 2026. Telkom respectfully request a slot on 16 January 2026, due to unavailability on 15 January 2026.

Yours Sincerely



**Nozipho Mngomezulu**  
**Group Executive: Regulatory and Legal Services**

Telkom Submission:

## 2<sup>nd</sup> Draft National Radio Frequency Plan 2025

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## 2 INTRODUCTION

1. Telkom welcomes the opportunity to comment on the second draft National Radio Frequency Plan (**"2<sup>nd</sup> draft Frequency Plan"**).
2. Welcome notes that most of its comments made to the first draft National Radio Frequency Plan (**"1<sup>st</sup> draft Frequency Plan"**) have been incorporated in the 2<sup>nd</sup> draft Frequency Plan.
3. Telkom trusts that its comments to the 2<sup>nd</sup> draft Frequency Plan will assist the Authority in finalising the National Radio Frequency Plan 2025 (**"NRFP-25"**), which is long overdue.
4. Telkom's comments to the 2<sup>nd</sup> draft Frequency Plan are contained in sections 3 and 4 below, addressing some general comments and band specific comments.

## 3 GENERAL COMMENTS

5. Telkom did not review all the frequency bands and all amendments in the 2<sup>nd</sup> draft Frequency Plan, due to limited time for review. We respectfully request the Authority to, once all proposed changes have been adopted, to review the entire NRFP-25 to ensure accuracy in terms of, amongst others, references to WRC Resolutions, consistency between entries within the same frequency ranges pertaining to the same service or application, horizontal alignment between columns, all acronyms have been listed in section 1 of the NRFP-25, short service description has been added to all WRC Resolutions, alignment between the NRFP-25 and other documents such as the Radio Frequency Spectrum regulations (**"RFSR"**), etc.
6. As per Telkom's comments to the 1<sup>st</sup> draft Frequency Plan, we didn't review the list of the International Telecommunications Union (**"ITU"**) footnotes. Telkom requests the Authority to ensure that this information is accurate and aligned with the ITU Radio Regulations, Edition 2024.
7. Table 1 in the 2<sup>nd</sup> draft Frequency Plan lists frequency and wavelength bands. Telkom recommends that this table be further updated in line with Table 1 in ITU-R Recommendation V.431-9, which was published in October 2025. In this new ITU-R Recommendation, Band 3 (Ultra low frequency , 300-3000 kHz) and Band 12 (Tremendously high frequency, 300-3000 GHz) were added.
8. With regards to Table 2 (Standard Frequency Band Nomenclature) in the 2<sup>nd</sup> draft Frequency Plan, Telkom recommends alignment with Table 4 in ITU-R Recommendation V.431-9. Specifically, it should be noted that the nomenclature for radars and space radiocommunications differ. Telkom recommends that the nomenclature be used with caution, as also highlighted in Note 5 in ITU-R Recommendation V.431-9.

## **4 BAND SPECIFIC COMMENTS**

### **4.1 IMT450 (450-470 MHz)**

9. Telkom supports the proposed use of the band 450-470 MHz for IMT, Government services, and possibly also Public Protection and Disaster Relieve (“PPDR”). Telkom nevertheless wishes to express the following:
- a. In the sub-band 455-456 MHz:
    - i. “Fixed” under Government Services should be changed to “fixed links”, in line with the rest of the band 450-470 MHz.
  - b. In the sub-band 459-460 MHz:
    - i. IoT and M2M is associated with Government Services, which should be moved to IMT.
    - ii. Reference to Government Services is duplicated.
    - iii. Whereas reference is made to IoT and M2M under IMT, it is assumed these are - only examples. IMT use should be technology/service neutral as also described in the IMT450 RFSAP. Telkom recommends that the Authority indicates that these are only example applications under IMT.
  - c. The use of the band 450-470 MHz for PPDR is supported. If this is adopted, it should lead to an updated of the IMT450 RFSAP.

### **4.2 IMT700 and IMT750 (694 – 790 MHz)**

10. Telkom agrees with the addition of HIBS in the frequency range 694-960 MHz. Telkom nevertheless still requests the Authority to coordinate the introduction of HIBS in this frequency range through an appropriate amendment of the relevant RFSAPs (i.e. IMT700, IMT750, IMT800 and IMT900). This is in line with *invites administrations 1* of Resolution 213 (WRC-23) (“*to adopt appropriate frequency arrangements for HIBS in order to consider the benefits of harmonized utilization of the spectrum for HIBS and protection of existing services and systems operating on a primary basis...*”). This request is because most of the spectrum in the range 694-790 MHz have been assigned exclusively to various mobile network operators on a national basis. HIBS should therefore not be seen as an application that needs to be licenced separately outside the existing IMT spectrum licences.
11. Telkom accepts the references to “*consideration of the future spectrum needs for PPDR in the band 694-790 MHz*” with the understanding that such consideration will involve a separate public consultation process.

### **4.3 IMT800 and IMT850 (790-862 MHz)**

12. Telkom recommends that a reference to the Radio Frequency Spectrum Regulations (GG. No. 38641, 30 March 2015) be added to the Notes and Comments column in relation to PMSE and Body Worn Equipment. This aligns with the reference to this Regulation in other sub-bands. This reference is currently only in the last column, which will be deleted before publication.

#### **4.4 Frequency range 862-960 MHz**

13. Telkom supports the use of the band 874.4-880 MHz paired with 919.4-925 MHz for FRMCS as per CEPT Report 90. However, in the sub-band 862-890 MHz, reference is made to “PMR for GSM-R” whereas in the sub-band 890-942 MHz, reference is made to “RMR/FRMCS”. Telkom recommends that the latter be used in line with CEPT Report 90.
14. The return sub-band for RMR/FRMCS (874.4-880 MHz) must also be added to the Notes and Comments column in the sub-band 890-942 MHz.
15. Telkom also recommends that RMR (Railway Mobile Radio) be added to the acronyms section.

#### **4.5 IMT1500 (1427 – 1518 MHz)**

16. Telkom agrees with the addition of a reference to “Res 750”. Telkom however recommends that this be changed to “Res. 750 (Rev.WRC-19) (passive)” in line with sub-band 1429-1452 MHz.
17. The reference to Res. 750 in the sub-band 1452-1492 MHz must be deleted. As per Resolution 750, the protection of EESS by active systems is limited the band 1427-1452 MHz (see table 1 in Resolution 750).
18. In line with the IMT1500 Radio Frequency Spectrum Assignment Plan (“**RFSAP**”), it is reflected in 2<sup>nd</sup> draft Frequency Plan that IMT can be deployed as either TDD or SDL. The band cannot however be used between multiple licensees for both TDD and SDL. Telkom recommends that this be addressed through an appropriate amendment of the RFSAP prior to making this band available for licensing as sharing between SDL and TDD will not be possible unless guardbands are introduced between assignments. Telkom recommends that the band be used only for SDL, in line with Europe.

#### **4.6 Frequency band 1710 – 1930 MHz**

19. The Authority added several references/comments to this band related to the sub-band 1880-1900 MHz, which need clarification. These are:
- a. “ECC Report 196” – this report deals with “Abuse, delay, and compensation mechanisms in Number Portability” and seems therefore irrelevant in the band plan.
  - b. “ICASA’s RFSAP already recognises DECT systems” – there is no RFSAP dealing with DECT systems in the band 1880-1920 MHz. It is assumed that the reference to “RFSAP” should be changed to “Radio Frequency Spectrum Regulations, 2015”.
  - c. “ITU-R Resolution 59 (Rev.WRC-19)” – This Resolution deals with studies on availability of frequency bands for worldwide and/or regional harmonization and conditions for their

use by terrestrial electronic news gathering systems. It is therefore not clear if the intend is to investigate the possible use of the DECT band (1880-1900 MHz) for ENG's in general or if this indicates that DECT systems (such as DECT-based audio applications) could be used in the context of ENG and/or SAB/SAP. Telkom requests that this be clarified.

- d. "ITU-R Report BT.2338" – this report provides a description of services ancillary to broadcasting/services and ancillary to programme-making spectrum use in Region 1 and the implication of a co-primary allocation for the mobile service in the frequency band 694-790 MHz. It is therefore not clear what the relevance is with regards to the DECT band, where there is an existing mobile allocation. If the intend is to use the DECT band for SAB/SAP applications, this needs to be further defined and clarified. If this is the intend, and with FRMCS earmarked for 1895-1915 MHz, the sharing and compatibility with SAP/SAB applications must be considered.

20. In terms of the use of FRMCS, Telkom wishes to highlight the following:

- a. Reference is made to both PMR for GSM-R and FRMCS. It is Telkom's understanding that this band is designated for FRMCS in Europe, whereas the 900 MHz band will be migrated from GSM-R to FRMCS in line with CEPT Report 90. References to "PMR for GSM-R" in the 1900 MHz band is therefore not needed. The Authority should rather refer to RMR/FRMCS.
- b. The reference to "PMR for GSM-R (paired with 874.4-880 MHz)" is not applicable to the 1900 MHz band and should be deleted (FRMCS in the 1900 MHz band is TDD).
- c. The band for FRMCS is indicated as 1895-1951 MHz, which is incorrect. It is assumed that this is intended to be 1895-1915 MHz.
- d. Whereas FRMCS in Europe will be allocated to the band 1900-1910 MHz, the allocation to FRMCS of the band up to 1915 MHz requires the careful consideration of compatibility with IMT2100 systems (starting at 1920 MHz). Protection of IMT2100 must be guaranteed.
- e. Whereas the development of a RFSAP for the 1900 MHz band has been retained, this was moved to the last column, which will eventually be deleted. It is not clear why this was done, considering that the references to the development of the IMT1800 and IMT2100 RFSAPs were retained in the Notes and Comments column. Telkom recommends that the development of the RFSAP for the 1900 MHz band be retained in the Notes and Comments column so that it remains in the NRFP-25.
- f. The Authority could refer to ECC/DEC/(20)02 and ECC/REC/(23)01, which applies to RMR in the 1900 MHz band.
- g. If the band 1885-1915 MHz is earmarked for RMR/FRMCS systems, it is assumed that the reference to IMT1900 TDD (1900-1920 MHz) could be deleted. This must be verified and confirmed.

21. A reference is made to Section 5 of this “NRFC”. This acronym has not been defined and is not used anywhere else in the National Radio Frequency Plan (“**NRFP**”). Telkom recommends that the acronym NRFP be used and be added to the acronyms section.

#### **4.7 Frequency bands 2010 – 2025 MHz, 2110 – 2170 MHz, 2120-2160 MHz and 2160-2170 MHz**

22. A legacy reference (in square brackets) has been retained in the band 2010-2025 MHz, referring to “FIXED (HAPS)(base stations for IMT)”. Telkom recommends that this be deleted as the use of the band can be used for HIBS in terms of 5.388A, which have been captured appropriately.
23. A similar reference is also contained in the bands 2110-2170 MHz, 2120-2160 MHz and 2160-2170 MHz (“[FIXED (HAPS) (base stations for IMT)]”, which should also be deleted. These bands can be used for HIBS in terms of 5.388A, which have been captured appropriately.

#### **4.8 Frequency bands 1980-2010 MHz and 2170-2200 MHz**

24. These bands have been earmarked for IMT satellite services. In the band 1980-2010 MHz, “Fixed links” have been retained, whereas fixed links have been deleted from the band 2170-2200 MHz. Telkom recommends alignment between these two bands in terms of its use for fixed services. Telkom recommends that the reference to fixed links be deleted from both.
25. The use of both bands for CGC/ATC must be retained. Telkom remains of the view that these operate under the mobile service rather than fixed.

#### **4.9 Frequency band 2300-2400 MHz**

26. Reference to “FAR147” has been added to this band, in line with the IMT2300 RFSAP. Telkom recommends that this term be defined in the NRFP.
27. The use of this band for non-IMT within the FAR147 area should be temporary; in the long-term these systems must also be migrated. Telkom notes that the use of this band in FAR147 for non-IMT applications have diminished over the past years, which is an indication that it could perhaps be terminated soon. This will allow full IMT use on a national basis.

#### **4.10 Frequency band 3600 – 4200 MHz**

28. The Authority added IMT use in the band 3600-3800 MHz, in line with the decisions at WRC-23. Telkom also supports the development of a RFSAP for this band. What is however not yet clear, is whether the existing licences will be amended to allow IMT or if the status quo will remain until the conclusion of the development of the RFSAP. Telkom recommends that it be made clear in the NRFP-25 that any mobile/IMT used in this band will only be in done in accordance with a RFSAP to be developed for this band. Telkom’s comments made pertaining to the 1st draft Frequency Plan remains valid.
29. With the division of the band 3600-4200 MHz into 3600-3800 MHz and 3800-4200 MHz, the reference to the registration of C-Band Earth stations in the band 3600-3800 MHz could be deleted as this relates, in Telkom’s understanding, to the Dynamic Spectrum Access and

Opportunistic Spectrum Management (“**DSA**”) developments, which is relevant to the band 3800-4200 MHz.

30. As per our previous submission, Telkom remains of the view that the licensing of C-Band earth stations in this band, like any other frequency band, is required (both transmit and/or receive stations must be licensed, unless it has been exempted by the Authority in terms of section 31(1) of the Electronic Communications Act (“**ECA**”). Telkom is not aware of any C-Band earth stations that have been exempted from requiring a spectrum licence. It is therefore not clear why the Authority requests operators to apply for spectrum licences if this is mandated by legislation.

#### **4.11 Frequency band 4800 – 5000 MHz**

31. Telkom requests the Authority to add the reference to the fixed link channelling plan (i.e. “Recommendation ITU-R F.1099, Annex 1”) to all the sub-bands within the range 4800-5000 MHz, in line with sub-band 4800-4990 MHz. A reference to “Fixed links (4.8 GHz) (4400-5000 MHz)” must also be added to the sub-band 4825-4835 MHz.
32. Telkom recommends addition of a reference to “FMP as amended” be added to the frequency range 4500-5000 MHz, noting that the migration of some fixed links in this broader frequency range may be required to implement IMT in the band 4800-4990 MHz.

#### **4.12 Frequency band 6425 – 7125 MHz**

33. Telkom notes, with concern, the addition of WAS/RLAN to the band 6425-7125 MHz (Upper 6 GHz). The use of this band for WAS/RLAN is not in line with South Africa’s and ATU’s position for agenda item 1.2 at WRC-23. South Africa and Africa supported the use of this band for IMT, while WAS/RLAN was allocated to the band 5925-6425 MHz (Lower 6 GHz). The shared use of the band between IMT and WAS/RLAN was proposed by a few countries (USA, Korea and Saudi Arabia) at WRC-23 and, as a compromise to reflect their particular use of the band, and therefore the reference to WAS/RLAN was added. Europe subsequently also decided to study possible shared use between IMT and WAS/RLAN in the band, which we elaborate on below.
34. CEPT was tasked to study the feasibility of sharing the band 6425–7125 MHz between Mobile/Fixed Communications Networks (MFCN / IMT) and WAS/RLAN, while also considering existing incumbent uses (fixed links, satellite uplinks, etc.). CEPT Report 362 summarises the results of compatibility/coexistence studies. Amongst others, the study concluded that using full-power MFCN (e.g. macrocell base stations) together with standard-power WAS/RLAN on the same channel (co-channel) would lead to unacceptable interference / degradation for one or both services. Reducing the IMT base station power around 25dB may allow shared use; this will however substantially reduce the viability of IMT macrocell deployment.
35. Based on CEPT Report 362, the Radio Spectrum Policy Group (“RSPG”) made several recommendations. In the main, the RSPG recommends that the bulk of the band i.e. 6585–7125 MHz (540 MHz) be made available for use by full power MFCN (mobile networks / IMT), whereas the band 6425-6585 MHz (160 MHz) be treated as a guardband in Europe, for now. The guardband will protect the existing WAS/RLAN allocation in the lower 6 GHz band and will also be reconsidered post WRC-27 based on the outcome of Agenda Item 1.7.

36. Telkom doesn't support the delay in identification of the full Upper 6 GHz band for IMT. This was approved at WRC-23, in line with the position taken by South Africa and Africa as indicated above. Not allocating the full Upper 6 GHz band for IMT now, will create complexity and uncertainty at WRC-27 in terms of Agenda Item 1.7, which outcome cannot be predicted. In any event, considering the extensive use of the 7 GHz and 8 GHz bands for, amongst others, fixed links, could result in these bands not been identified for IMT at WRC-27. Telkom therefore remains of the view that the Upper 6 GHz band should be allocated in full to IMT, whereas the Lower 6 GHz band is available for WAS/RLAN. This is also in line with the ATU recommendations for these two bands.
37. Telkom therefore also request the Authority to remove the reference to WAS/RLAN from the Upper 6 GHz band. Retaining this reference, even with the intention to further consider such as at a future date, may allow an opportunity for licensees to proceed and deploy WAS/RLAN on a licence exempted basis. Such deployments will be very difficult to reverse in future. If the Authority do wish to further consider the use of the Upper 6 GHz band, or parts thereof, for WAS/RLAN, a note could be added to such effect, making it very clear that such use is not allowed. Telkom's preference remains however that the band should be identified for IMT in full, as per South Africa's position at WRC-23.
38. Telkom also recommends that a reference to NF9 be added to all sub-bands in the band 6425-7125 MHz since this band is earmarked for IMT. The Upper 6 GHz band must therefore also be added to the table in NF9. These additions can be done in line with the WRC-23 decisions for this band, as also supported by South Africa and ATU.

#### **4.13 Frequency band 10.7-11.7 GHz**

39. The band 10.7-11.7 GHz can be used for BSS feeder links (uplink) according to ITU footnote 5.484. The note in the Notes and Comments column must therefore be amended to accurately reflect 5.484. FSS (uplink) in this band can be used for only one service namely BSS feeder links. Telkom recommends the following amendment to the current note to accurately reflect 5.484:

*"The use of the band 10.7-11.7 GHz by the fixed-satellite service (Earth-to-space) is limited, ~~can also be used for~~ to BSS feeder links (see 5.484)."*

40. It is also not clear why the above note has been deleted from some sub-bands within the frequency range 10.7-11.7 GHz. Telkom recommends that the above note be added to the entire band 10.7-11.7 GHz.
41. Telkom agrees with the addition of Resolution 155 to the band 10.95-11.2 GHz. Telkom recommends that the Resolution date as well as a suitable description be added, for example: "Resolution 155 (Rev.WRC-19) (unmanned aircraft)". The reference to Resolution 155 should also be added to the sub-band 11.45-11.7 GHz.
42. In the sub-band 11.2-11.45 GHz, the reference to DTH applications should be deleted. GSO FSS systems operating in this sub-band must be in accordance with Appendix 30B; DTH doesn't comply to Appendix 30B and should therefore be removed from this sub-band (and DTH doesn't operate in this sub-band).

#### **4.14 Frequency band 14-14.5 GHz**

43. The acronym UAS CNPC (unmanned aircraft systems control and non-payload communication) must be added to the list of acronyms.

#### **4.15 Frequency band 17.1-17.3 GHz**

44. In the 2<sup>nd</sup> draft Frequency Plan, the band 17.1-17.3 GHz is available for WAS/RLAN. A reference to the RFSR, 2015 is also indicated. This band is allocated to Radiolocation services on a primary basis.
45. Telkom is of the view that this band is not used for WAS/RLAN but only for radiodetermination application, as reflected in the RFSR, 2015. The reasons are:
- a. This band is neither contained in Annex 3 (Wideband data transmission systems) to ERC Recommendation 70-03 (Short range devices) nor contained in ERC Report 25 (January 2025).
  - b. Although the RFSR, 2015 refers to “HiperLAN” in the band, there is no national or European standard listed for such application in this band.
  - c. The band is listed in Annex 6 to Recommendation 70-03 for Ground Based Synthetic Aperture Radar or GBSAR (radiodetermination application).
46. Telkom requests the Authority to consider the above and if confirmed that WAS/RLAN is not used in this band it be deleted from the NRFP-25.

#### **4.16 Frequency band 21.2 - 23.6 GHz**

47. As indicated in our previous submission, Telkom is of the view that BSS in the 23 GHz band should not be retained for the following reasons:
- a. The 23 GHz band is critical important of fixed links, including backhaul for mobile base stations. Sharing between fixed links and thousands of BSS small antenna receivers may be difficult.
  - b. The Ku-band (14 GHz and 11 GHz) is used for BSS services in South Africa so the need for the 23 GHz for BSS is not evident.
  - c. A dedicated/new satellite will have to be launched for BSS in the 23 GHz to serve South Africa, which may not be economically viable noting also other national and regional satellite projects.
48. In the absence of clear and committed plans to launch a BSS satellite in the 23 GHz band, Telkom recommends that the use of BSS in South Africa in this band be deleted form the NRFP-25 to ensure the long-term protection and certainty of use of the band for fixed links.

#### **4.17 Frequency band 37 – 43.5 GHz**

49. Telkom supports the use of the frequency band 37-43.5 GHz for IMT in line with WRC-19. Telkom also agree with the development of a RFSAP for this band and that the use of the band for IMT (and parts for HAPS) be conditional on the publication of the RFSAP.
50. However, the note regarding the use of IMT, which is conditional on the publication of the RFSAP, has not be replicated in all parts of the band 37-43.5 GHz or in other IMT bands, for example the 26 GHz band. Telkom is concerned that this may create the impression that these other bands (where the conditional use text has not been added) can be used for IMT prior to the development of the RFSAP for these other bands. Telkom requests the Authority to align the notes in all relevant bands to ensure that IMT use is dependent on the availability of a RFSAP.

#### **4.18 Frequency band 47.2 – 48.2 GHz**

51. Telkom supports the addition of IMT in the band 47.2-48.2 GHz. Telkom recommends that “TDD (47.2-48.2 GHz)” be added with IMT in the Typical Applications column in the sub-band 47.2-47 GHz, in line with other IMT bands.
52. In the sub-band 47.9-48.2 GHz, the band reference in the note referring to the RFSAP to be developed must be amended. The applicable frequency band is 47.2-48.2 GHz. The frequency band info should be added to this note in all other sub-bands in the frequency range 47.2-48.2 GHz.
53. In the Typical Applications column for the sub-band 47.9-48.2 GHz, the IMT (TDD) band reference is incorrect. This applicable frequency band should be 47.2-48.2 GHz.

#### **4.19 Frequency band 51.4 – 52.6 GHz**

54. Telkom supports the addition of fixed links for the band 51.4 – 52.6 GHz.
55. Telkom recommends that a reference to NF14 also be added to the FIXED allocation in the second column. Furthermore, the frequency band and the applicable ITU Recommendation (ITU-R Rec. F.1496, Annex 1) must also be added to the table in NF14.

#### **4.20 Frequency band 55.78 – 66 GHz**

56. Telkom supports the addition of fixed links to the band 55.78-66 GHz. As indicated in the previous submission, this band is referred to as the 62 GHz band as per ITU-R F.746-11. The channelling arrangements for this band is contained in ITU-R F.1497. The band is divided into three sub-bands.
57. In terms of sub-band 55.78-57 GHz, a reference to the channelling plan for the 55.78-57.0 GHz band, which is in accordance with ITU Rec. F.1497, Annex 1, should be added to the sub-band 55.78-56.9 GHz.
58. In addition to the application of Fixed links (57-66 GHz), the Authority also added a reference to “Point-to-Point Digital Fixed Radio Systems (DFRS) in 57-66 GHz” (in some sub-bands the frequency for DFRS is indicated as 57-64 GHz). It is not clear what the difference is between these

two entries (i.e. fixed links and DFRS). Telkom recommends that this be further clarified or the reference to one be deleted.

59. For completeness, Telkom recommends that the 62 GHz band (and its three sub-bands) be added to the table in NF14. A reference to NF14 should also be added in the second column in the NRFP (next to FIXED). See also comments below with regards to NF14.

#### **4.21 NF9 (IMT Frequency Bands – Terrestrial)**

60. Telkom proposed amendments to the table of IMT bands as contained in NF9 in our submission pertaining to the 1<sup>st</sup> draft Frequency Plan. Whereas some proposals have been adopted, others have not been incorporated in the 2<sup>nd</sup> draft Frequency Plan. Telkom accepts that its proposals doesn't have to be accommodated, however, factual inaccuracies and omissions must be considered. Telkom respectfully requests the Authority to revisit Telkom's previous submission pertaining to NF9. Issues to be resolved include:

- a. Updated of WRC dates.
- b. Addition of frequency bands such as 750 MHz.
- c. Whereas channel plan numbers from Recommendation M.1036 have been added for some bands, this has not been done for all bands.
- d. The overlap between the 1900 MHz and 2100 MHz (TDD) bands have not been addressed.
- e. The 45 GHz band has not been added.

#### **4.22 Channel arrangements for Fixed Services Systems**

61. Telkom notes that some factual and editorial proposals as per our submission pertaining to the 1<sup>st</sup> draft Frequency Plan have not been included in the 2<sup>nd</sup> draft Frequency Plan. Telkom recommends consideration of the following:

- a. Correction of the Annex numbers pertaining to the Lower and Upper 8 GHz band (these have been corrected in the band plan but not in the table in NF14).
- b. The 52 GHz band must be added.
- c. The 57 GHz band must be changed to the 62 GHz band. The band must also be divided into the three sub-bands, in line with the changes made in the table.

62. In addition to the comments made to the 1<sup>st</sup> draft Frequency Plan, Telkom recommends that frequency bands above 92 GHz be considered for fixed links and that relevant frequency bands be added to the NRFP-25. Although most of these bands are not yet included in ITU-R Recommendations, channelling arrangements for bands above 92 GHz are included in Europe as follows:

- a. ECC REC 18(01) for the bands 130-134 GHz, 141-148.5 GHz, 151.5-164 GHz and 167-174.8 GHz; and
- b. ECC REC 18(02) for the bands 92-94 GHz, 94.1-100 GHz, 102-109.5 GHz and 111.8-114.25 GHz.

63. These bands could be further considered in future, for example, the specific channelling arrangement options to be adopted for South Africa (e.g. FDD vs TDD, channel bandwidth, etc).

#### **4.23 NF16 (5725-5850 MHz)**

64. Telkom recommends that the Authority reconsiders Telkom's proposed amendments to the frequency bands (i.e. upper limit which should 5875 MHz rather than 5850 MHz) contained in the table to align with the RFSR, 2015 (Annexure B).

65. Telkom also recommends reconsideration of the 200 Watt maximum power limit option, which is no longer contained in the RFSR, 2015 (Annexure B). In Telkom's comments to the 1<sup>st</sup> draft Frequency Plan we indicated also that this power option is no longer contained in the relevant FCC regulations, where it was first introduced. If this power level option is retained in the NRFP-25, while removed from the RFSR, 2015, it will create regulatory uncertainty and will be used by some operators. This must be corrected.

66. NF15 and NF16 should also be separated for better reading while the NF16 title should be bold.

67. Telkom further also recommends that NF16 be expanded to include all WAS/RLAN bands, for example the 5150-530 MHz, 5470-5725 MHz and 5925-6425 MHz.