

14 June 2013

Mr Mandla Mchunu
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By email: mmchunu@icasa.org.za

NOTICE ON APPLICATION BY MTN FOR AN ADDITIONAL 5 MHz TDD BLOCK IN THE 2100 MHz FREQUENCY BAND (2010-2015 MHz)

Dear Mr Mchunu

The Authority's notice, in Government Gazette number 36540 dated 6 June 2013, on the application for an additional 5 MHz TDD block in the 2100 MHz radio frequency band (2010-2015 MHz) refers.

Vodacom has several concerns with this notice, namely:

1. The Government Gazette Notice of the application provides only seven days for comments. The Gazette was not circulated by ICASA as it normally does and is also not on the ICASA website. Vodacom only became aware of this publication on 13 June 2013, one day before the closing date. In future the Authority should provide at least two weeks for interested parties to comment on such important matters.
2. The Authority has determined that this is a High Demand spectrum band where demand exceeds supply and imposed a 50% premium on the normal spectrum fees calculated in terms of the spectrum fees regulation 2010. Vodacom submits that the Authority must invite applications for this spectrum in terms of section 31(3) of the Electronic Communications Act and regulation 7(2) of the Radio Frequency Spectrum regulation 2011.

Yours sincerely



Mortimer Hope, Pr Eng

Executive Head of Division: Technical Regulation
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