



3 February 2017

The Independent Communications Authority of South Africa

Attention: Mr. Manyapelo Richard Makgotlho

Per email: rmakgotlho@icasa.org.za

Dear Sir,

SUBMISSION ON THE DRAFT UPDATE OF THE NATIONAL RADIO FREQUENCY PLAN

Introduction

1. WAPA refers to the publication of the Draft Update of the National Radio Frequency Plan ("the draft NRFP") and the invitation by the Independent Communications Authority of South Africa ("the Authority") to make written representations thereon.
2. WAPA was formed in 2006 as a non-profit organisation representing the interests of wireless Internet service providers (WISPs) in both urban and rural locations in South Africa. WAPA promotes technical and business best practices for wireless connectivity providers and engages in policy work to promote spectrum allocation and assignment, wholesale service provision and SMME enablement.
3. WAPA currently represents more than 220 organisations, including large and small players, as well as support industries such as equipment vendors and software providers.
4. WAPA wishes at the outset to express its appreciation for the Authority's efforts in improving accessibility to the draft NRFP through the implementation of various changes designed to enhance the utility of the document as a reference source (specifically improvements to the footnotes, comments and the inclusion of channelling plans).
5. The highlighting of proposed amendments to the draft NRFP – which WAPA had requested in the previous round of updates to the NRFP – stands to the credit of the project team.

General remarks on changes concerning Fixed Services

6. WAPA welcomes the addition of various allocations for Fixed Services (PTP).

General remarks on changes concerning Broadband Fixed Wireless Access

7. WAPA submits that the historical scarcity of Broadband Fixed Wireless Access ("BFWA") spectrum (on both a licenced and licence-exempt basis) represents the single greatest barrier to expansion of the Industry and accordingly welcomes the addition of multiple BFWA allocations in the draft NRFP.
8. The BFWA allocation in 3 600 – 4 200 MHz is of particular interest to WAPA's members and it is requested that the Authority provide clarity on how it will assess feasibility between BFWA, FS PTP and FSS applications and how it will implement sharing in this band on a practical level.

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9. Where there has been an overlap in allocations and pending any future migration of allocations, as with BFWA and VSAT in 3 600 – 4 200MHz, it is requested that the Authority provide clarity on which assignments will be available to licensees for use in BFWA applications.
10. It is requested that the Authority provide a timeline for migration of the current VSAT usage in 3 600 – 4 200MHz to the Ku band.

Conclusion

11. WAPA hereby confirms its desire to participate in any future hearings which may be held in relation to the draft NRFP.
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