



1 December 2017

ICASA

Attention: Mr. Manyapelo Richard Makgotlho

Per email: rmakgothlo@icasa.org.za

Dear Sir

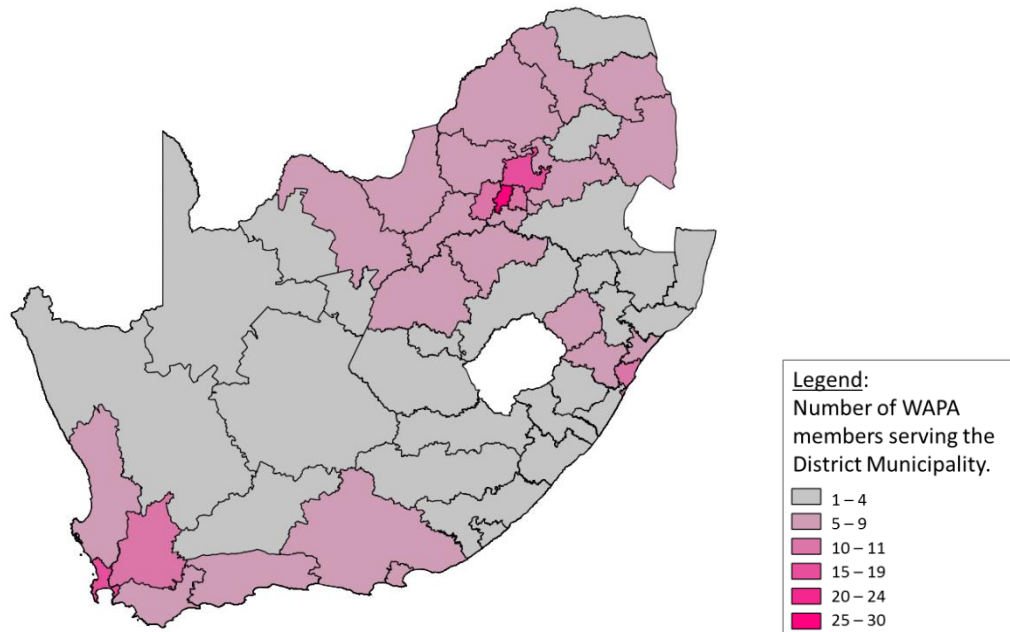
**Draft Radio Frequency Spectrum Assignment Plan for the frequency band 2025 to 2110 MHz
paired with 2200 to 2285 MHz**

Draft Radio Frequency Spectrum Assignment Plan for the frequency band 2285 to 2300 MHz

1. WAPA refers to the publication of the above draft Radio Frequency Spectrum Assignment Plans (RFSAPs) and sets out its comments below.
2. WAPA strongly supports the two draft RFSAPs in their current form and welcomes the long overdue consideration of making spectrum available for BFWA.
3. This would significantly improve the ability of rural and peri-urban Wireless Internet Service Providers (WISPs) to expand their networks in these areas. WAPA has for more than a decade engaged with the Authority about the need for licensed access spectrum to be available for fixed wireless broadband and voice service provision outside of the metropolitan and larger urban areas.
4. A typical WAPA member is an SMME which self-provides its own electronic communications network in a rural area and provides Internet access and sometimes voice services over this network to subscribers. In many rural and peri-urban locations WAPA members provide the only cost-effective alternative to the mobile networks for Internet access.
5. WAPA members collectively operate robust, fit-for-purpose communications networks throughout South Africa. The map below – created from information collected through WAPA's 2013 internal census - indicates that there are WAPA members providing Internet access services in every district and metropolitan municipality in South Africa.

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6. WAPA strongly urges the Authority to retain the position of allocating the band 2285 – 2300 MHz to BFWA rather than using it as a future extension of IMT2300. Allocating to IMT would ignore the vast imbalance in the availability of spectrum for mobile and fixed wireless service provision respectively.
7. WAPA's members have achieved this coverage using a mixture of fibre, licensed backhaul links and licence-exempt spectrum for access. Coverage and quality of service would be massively enhanced if licensed access spectrum is made available.
8. WAPA supports the position in the Frequency Migration Plan 2013 of making further assignments for broadband fixed wireless where this does not cause harmful interference to fixed links (point to point).
9. Should the Authority hold any further process in this regard, WAPA hereby expresses its desire to participate.

Regards

Tim Genders

WAPA Chairperson