



Wireless Access Providers' Association of South Africa
www.wapa.org.za

27 August 2021

Independent Communications Authority of South Africa

Attention: Mr Manyapelo Richard Makgotlho

Per email: rmakgotlho@icasa.org.za

DRAFT NATIONAL RADIO FREQUENCY PLAN 2021

Introduction

1. The Wireless Access Providers' Association of South Africa ("WAPA") welcomes the Authority's invitation to comment on the Draft National Radio Frequency Plan 2021¹ ("Draft NRFP 2021").
2. WAPA wishes to thank the project team for its time and effort in preparing this update to the National Radio Frequency Plan.
3. WAPA's submission is limited to the entries relating to the use of television white spaces ("TVWS"). The Authority is aware of WAPA's historical and continued advocacy for the development of an enabling regulatory framework for the use of dynamic spectrum management tools in the UHF band in South Africa.
4. WAPA notes the repeated appearance of the following entry in the "Notes and Comments" column for the allocations in respect of 470-606MHz, 606-614MHz, and 614-694 MHz:

"The use of 'White Spaces' in this band is under consideration (subject to Non Interference Non Protection basis to users under a primary allocation). 470 – 606 MHz, max. 50 mW ERP 606 - 614 MHz, max. 50 mW ERP Radio Frequency Spectrum Assignment Plan, Government Gazette 43341 (Notice 284 of 2020)"

5. Following publication of the Authority's Notice to enforce the Regulations on the use of Television Whitespaces 2018² wherein it declared the Regulations on the User of Television White Spaces 2018³ in force (together with inviting eligible wireless internet service providers to contact qualified S-GLSD service providers for subscription to their service/s) it had been WAPA's understanding that the regulatory

¹ Notice 403, GG 44803, published 9 July 2021

² Notice 164, GG 44373, published 31 March 2021

³ Notice 147, GG 41512, published 23 March 2018

framework for the use of TVWS on a commercial basis within South Africa had come into full force and effect.

6. WAPA submits that it this note should refer directly to the Regulations on the use of Television Whitespaces 2018 as they set out the technical and other parameters applicable to the use of TVWS on a licence-exempt basis.
7. WAPA accordingly requests that the Authority ensure the aforementioned entries accurately reflect the position set out in the 2018 Regulations.

Conclusion

8. WAPA would welcome the opportunity to participate further in this process, either through attending public hearings or in writing, and hopes that its submissions will assist the Authority in refining the Draft NRFP 2021.

Regards,

WAPA EXECUTIVE COMMITTEE