



the westbury community development centre
IT 4455/00

28 May 2025

Attention: Mr Davis Kgosimolao Moshweunyane

ICASA

350 Witch-Hazel Ave, Eco-Park Estate, Centurion, 0144, South Africa

e-mail: dmoshweunyane@icasa.org.za

Draft National Radio Frequency Plan 2025

Dear Moshweunyane,

The Westbury Community Development Centre Trust would like to thank ICASA for the opportunity to make a submission on the above subject. Please find our comments attached.

Yours sincerely,

Joseph Cotty

Director

A handwritten signature in black ink, appearing to be "JC" with a large loop and a trailing flourish.

Peter Faver

A handwritten signature in black ink, appearing to be "P. Faver" in a cursive style.

Director

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Westbury Community Development Centre Trust (WECODEC)

COMMENTS to The Independent Communications Authority of South Africa

ON

Draft National Radio Frequency Plan 2025

May 2025

WECODEC is the first organisation to have conducted a technical DRM trial in the FM Band (DRM+) on the African continent, and with Kofifi FM 97.2 worldwide the only community radio station, marking an important milestone in community radio's transition to the digital age. As an organisation rooted in community empowerment, our vision extends beyond our own community in Westbury to encompass all underserved and underrepresented communities across South Africa and Africa as such.

We believe that DRM+ is the only viable digital radio technology that guarantees a future for community radio within the terrestrial broadcasting landscape. Unlike other technologies, DRM allows for efficient use of spectrum, affordable deployment, and direct integration into existing analog infrastructure—making it uniquely suited for community-level digital broadcasting.

It is deeply concerning that the Draft National Radio Frequency Plan 2025 makes no mention of DRM, neither in the Acronyms section nor in the spectrum allocations for the FM Band or AM Bands. Meanwhile, it references S-DAB, a superseded technology, and is narrowly focused on DAB+.

We also noted with concern that the Draft Plan still lists T-DAB in the L-Band (1452–1492 MHz), despite it being obsolete and no longer in use anywhere globally. However, WECODEC, in cooperation with ICASA, successfully conducted a Community Television trial using DVB-T2 in this very band (2014–2015). The trial demonstrated the viability of deploying DVB-T2 in 1.7 MHz channels, aligned with the common DVB-T2/T-DAB frequency raster. Given that DVB-T2 is South Africa's official digital terrestrial television (DTT) standard, its use in L-Band represents an ideal opportunity to enable localised, spectrum-efficient community TV services.

Our trial used off-the-shelf DTT set-top boxes supporting 1.7 MHz bandwidth, combined with a simple downconverter and a low-cost, locally produced receiving antenna – constructed from a standard coffee tin. This model is both affordable and scalable and holds potential for local job creation and grassroots innovation. We therefore propose that the Plan consider mentioning the L-Band for such community-centric DTT use, either alongside or in place of T-DAB.

We respectfully propose:

- The addition of DRM and DSB to the Acronyms as follows:
 - DSB Digital Sound Broadcasting
 - DRM Digital Radio Mondiale
 - DRM30 Digital Radio Mondiale in the AM Bands
 - DRM+ DRM in the VHF Bands including the FM-Band
- Remove S-DAB from the Acronym section as it does not have any reference.
- The explicit inclusion of DRM in the FM and AM spectrum allocations as follows:

ITU Region 1 allocations and footnotes	South African allocations and footnotes	Typical Applications	Notes and Comments
5.175 5.179 5.187			Radio Frequency Spectrum Assignment Plan GG 42286 Notice 124 of 2019
87.5-100 MHz BROADCASTING 5.190	87.5-100 MHz BROADCASTING	FM Sound Broadcasting (87.5-108 MHz) Digital Radio Mondiale (DRM) in the FM-Band (also referred to as DRM+)	The Terrestrial Broadcasting Frequency Plan (GG no.36321) 02 April 2013 Geneva agreement GE84 Digital Sound Broadcasting (DSB) Regulations was published in GG44469 Notice 215 of 2021

and the same at 100-108 MHz,

526.5-1 606.5 kHz BROADCASTING	526.5-1 606.5 kHz BROADCASTING	Medium Wave Sound Broadcasting (535.5 -1606.5 kHz) Inductive Loop Systems (740 – 8800 kHz)	The Terrestrial Broadcasting Frequency Plan as amended (GG No. 36321) 02 April 2013 Radio Frequency Spectrum Regulations (Annex B) (GG. No.38641, 30 March 2015).
5.87 5.87A		Digital Radio Mondiale (DRM) in the AM-Band (also referred to as DRM30)	Digital Sound Broadcasting (DSB) Regulations was published in GG44469 Notice 215 of 2021.

for MF; and for all HF Bands (2300-2498, 3200-3400, 3900-4000, 4750-4995, 5005-5060, 5900-6200, 7200-7450, 9400-9900, 11600-12100, 13570-13870, 15100-15800, 17480-17900, 18900-19020, 21450-21850, 25670-26100 kHz:

5 900-5 950 kHz BROADCASTING 5.134 5.136	5 900-5 950 kHz BROADCASTING 5.134 Fixed 5.136 Land Mobile 5.136 5.136	HF Sound Broadcasting DRM Sound Broadcasting	The Terrestrial Broadcasting Frequency Plan (GG no.36321) 02 April 2013 Article 12 Planning Procedures and Res.517 apply.
5 950-6 200 kHz BROADCASTING	5 950-6 200 kHz BROADCASTING	HF Sound Broadcasting DRM Sound Broadcasting	The Terrestrial Broadcasting Frequency Plan (GG no.36321) 02 April 2013 Article 12 Planning Procedures and Res.517 apply.

- Consideration of DRM for Band III use, in line with global practices:

174-223 MHz BROADCASTING 5.235 5.237 5.243	174-223 MHz BROADCASTING NF5	Analogue Television Broadcasting (174 – 214 MHz) T-DAB (214 – 230 MHz) Digital Sound-Broadcasting Digital Television Broadcasting (174 – 214 MHz) Wireless microphones (173.7 – 175.1 MHz) DRM (174 - 223 MHz) Digital Sound Broadcasting	TV Band III Migration from analogue to digital is harmonised in SADC. Digital Sound Broadcasting (DSB) planned in this band. TV Band III Regulations was published in GG44469 Notice 215 of 2021 The Terrestrial Broadcasting Frequency Plan as amended (GG no.36321) 02 April 2013 Radio Frequency Spectrum Regulations (Annex B) (GG. No.38641, 30 March 2015)
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223-230 MHz BROADCASTING Fixed Mobile 5.243 5.246 5.247	223-230 MHz BROADCASTING Fixed Mobile	T-DAB (214 – 230 MHz) Digital Sound Broadcasting DRM (223 - 230 MHz) Digital Sound Broadcasting	Migration from analogue to digital is harmonised in SADC. Digital sound broadcasting is being planned in this band. Digital Sound Broadcasting (DSB) Regulations was published in GG44469 Notice 215 of 2021 The Terrestrial Broadcasting Frequency Plan as amended (GG no.36321) 02 April 2013
230-235 MHz FIXED MOBILE 5.247 5.251 5.252	230-238 MHz BROADCASTING 5.252	Digital Television Broadcasting (230 – 238 MHz) DRM (230 - 238 MHz) Digital Sound Broadcasting	The Terrestrial Broadcasting Frequency Plan as amended (GG no.36321) 02 April 2013
235-267 MHz FIXED MOBILE	238-246 MHz FIXED MOBILE	PMR and/or PAMR(238- 242.95 MHz) International Distress Frequency at 243 MHz (242.95 – 243.05 MHz) Low-power devices (243.05- 246.00 MHz)	Band available for distress and safety purposes. Low-power devices ancillary to the broadcasting service.
5.111 5.252 5.254 5.256 5.256A	Mobile-satellite 5.111 5.252 5.254 5.256	DAB+ (238-242.95 MHz) DRM (238 - 242.95 and 243.05 - 246 MHz) Digital Sound Broadcasting	Mobile-satellite may be used in (235 -322 MHz) and (335.4 -399.9 MHz) Future consideration for Digital Sound Broadcasting in the band 238 – 240 MHz Channel 13F (239.2 MHz) can be used nationally for DAB+ as currently used.during DAB+ trials Radio Frequency Spectrum Regulations (Annex B) (GG. No.38641, 30 March 2015)
	246-254 MHz BROADCASTING 5.254	Digital Television broadcasting (246-254 MHz) DRM (246 - 254 MHz) Digital Sound Broadcasting	The Terrestrial Broadcasting Frequency Plan as amended (GG no.36321) 02 April 2013
	254-267 MHz MOBILE FIXED Mobile-satellite 5.111 5.254 5.256	Trunking BTX (254 – 259.4 MHz) Trunking MTX (262 – 267.4 MHz) Government Services (267.4-272 MHz)	Paired with 262 – 267.4 MHz Paired with 254 – 259.4 MHz Mobile-satellite may be used in (235 -322 MHz) and (335.4 -399.9 MHz)

- Add Digital Terrestrial Television (DTT) in the L-Band in addition to T-DAB:

ITU Region 1 allocations and footnotes	South African allocations and footnotes	Typical Applications	Notes and Comments
1 452-1 492 MHz FIXED MOBILE except aeronautical mobile 5.346 BROADCASTING BROADCASTING-SATELLITE 5.208B 5.341 5.342 5.345	1 452-1 492 MHz FIXED NF14 MOBILE except aeronautical mobile 5.346 BROADCASTING BROADCASTING-SATELLITE 5.208B 5.341 5.345	IMT Terrestrial Digital Audio Broadcasting (T-DAB) Digital Television Broadcasting (DVB-T2, Narrowband)	Resolution 528 (Rev. WRC-19) Resolution 739 (Rev. WRC-19).. Recommendation ITU-R M.1036-6 International Mobile Telecommunications (IMT)) Final Frequency Migration Plan 2019 (GG No.42337 Notice 36 of 2019) RFSAP to be Developed. DVB-T2 with 1.7 MHz bandwidth in the L-Band has successfully been tested in South Africa for community television.

A technology-neutral and inclusive approach to digital radio is essential to protect the future of community broadcasting in South Africa. We believe DRM offers the best chance to democratise digital broadcasting and empower every voice.