

To:

Ms. Pumla Ntshalintshali

Independent Communications Authority of South Africa (ICASA)

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RE: Draft Framework for Dynamic Spectrum Access

Submitted by: *National Youth ICT Council*

1. Introduction

The **National Youth ICT Council** welcomes ICASA's publication of the **Draft Framework for Dynamic Spectrum Access (DSA)**. We regard this as a landmark policy shift that has the potential to unlock shared spectrum for new entrants, empower youth owned ISPs, and democratise access to telecommunications infrastructure.

We support the framework's core objectives, which include:

- Promoting **efficient utilisation of underused spectrum**,
- Enabling **non-exclusive, shared spectrum access**,
- Expanding access for **SMMEs and rural operators**, and
- Advancing **universal service and digital inclusion goals**.

This submission provides recommendations on the **appointment of a Universal Spectrum Sharing Service Provider (USSSP)** and **enhancements to the DSA framework**, especially with a focus on **youth empowerment, local technology development, and equitable spectrum access**.

2. Policy Recommendations

A. Appoint Broadband Infraco as the USSSP

We recommend the appointment of **Broadband Infraco (BBI)** as the **Universal Spectrum Sharing Service Provider (USSSP)**. As a state-owned entity with national backhaul reach and a development mandate, BBI is best positioned to:

- Manage the Geolocation Spectrum Database (GLSD),
 - Ensure equitable, non-discriminatory access, and
 - Partner with youth led ISPs in deploying shared spectrum solutions in underserved areas.
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B. Prioritise Youth-Owned ISPs and Historically Disadvantaged Individuals

- Youth-owned ISPs (defined as **80%+ black youth ownership**) must be **prioritised** in the DSA rollout.
 - These ISPs must be granted **free access to DSA spectrum**, particularly in the early implementation phase.
 - All DSA access must **prioritise 100% black-owned licensees and HDIs**, to correct historical imbalances in spectrum ownership.
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C. Permit Class Licensees to Access DSA Spectrum

We strongly recommend that **Class ECNS and ECS licensees** be eligible for DSA access. The majority of youth-led ISPs operate under Class licenses. Excluding them would undermine transformation and entrench monopoly control.

D. Expand Bands Available for DSA Use – Technical Recommendation

While TV White Spaces and ISM bands (2.4 GHz, 5.8 GHz) are a strong start, **additional innovative and underutilised spectrum bands must be included** in the DSA framework:

Recommended Bands for Inclusion:

Band (MHz/GHz)	Description	Rationale
450–470 MHz	UHF spectrum often used for LTE and private networks	Ideal for rural broadband and low-power applications
870–876 MHz	Unlicensed or lightly used SRD band	Suitable for IoT and smart agriculture
1780–1830 MHz	Mid-band spectrum	Underutilized and well-suited for shared LTE deployments
3.3–3.6 GHz	Mid-band (5G range)	Globally adopted for shared 5G; could power township-based 5G ISPs
6 GHz (5925–7125 MHz)	Recently opened in many countries for Wi-Fi 6E and 7	Huge capacity potential for public Wi-Fi and SMMEs
26 GHz and above (mmWave)	Millimeter wave bands	Suitable for high-speed fixed wireless in dense townships

We urge ICASA to **conduct public consultations and technical studies** to open these bands for **dynamic and shared use**, especially for innovation zones and township networks.

E. Develop Sovereign DSA-Compliant Technology (with CSIR & TIA)

ICASA should facilitate partnerships between:

- **The Council for Scientific and Industrial Research (CSIR)**
- **The Technology Innovation Agency (TIA)**

to develop **sovereign, locally-manufactured wireless devices** that operate in shared DSA bands. This is critical for ensuring technological self-reliance, price competitiveness, and adaptation to South African topography.

F. Fast-Track Type Approval for Sovereign Technology

To enable rapid deployment, ICASA must establish a **fast-track process for type approval** of sovereign DSA-compliant technology. This includes:

- Devices developed through CSIR/TIA-backed programs,
- Open-source and affordable routers,
- Equipment designed for township and rural deployment.

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3. Conclusion

The DSA framework has the potential to reverse decades of exclusion in South Africa's telecommunications sector. But to succeed, the policy must:

- **Entrench transformation** through youth and HDI preference,
- **Unlock innovation** through sovereign technology, and
- **Ensure equity** through fair and open access mechanisms.

We urge ICASA to integrate these proposals and reaffirm our availability for **oral presentations or technical consultations**.

Warm regards,

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