

11 December 2025

Independent Communications Authority of South Africa

Block B

350 Witch-Hazel Ave

Eco-Park Estate

Centurion, 0169

For the attention of: Mr Davis Kgosimolao Moshweunyane / Mr Manyapelapo Richard

Makgotlho

Per email: dmoshweunyane@icasa.org.za / rmakgotlho@icasa.org.za

Dear Sirs

## **SECOND DRAFT NATIONAL RADIO FREQUENCY PLAN 2025**

1. eMedia refers to the publication by the Independent Communications Authority of South Africa (the Authority) for public consultation of the Draft National Radio Frequency Plan 2025 in Government Gazette 52449 on 4 April 2025 in the Government Gazette No. 52449, Notice 3109 of 2025 (the Draft Radio Frequency Plan).
2. Thank you for this opportunity to make written submissions on this second draft and we remain committed to engaging with the Authority on this process. Should the Authority decide to hold public hearings we would like the opportunity to make an oral representation. However, we request that hearings are held in late January/early February when all staff are back in the office.
3. As you may be aware, eMedia is the holding company in respect of a wide range of broadcasting interests. These interests include:
  - 3.1. e.tv (Pty) Ltd – the first private free-to-air broadcaster in South Africa which operates in terms of an Individual Broadcasting Licence and holds a corresponding Radio Frequency Licence;
  - 3.2. e.sat (Pty) Ltd – which is the holder of a Subscription Broadcasting Licence and currently broadcasts to pay channels on the platform known as Openview; and
  - 3.3. Platco Digital (Pty) Ltd – which broadcasts Openview as a free-to-air satellite service;
  - 3.4. YFM (Pty) Ltd – which has a Radio Broadcasting Licence and broadcasts on the FM frequency.

4. As such, eMedia has an interest in any changes to the current National Radio Frequency Plan. We set out our submissions below:

### UHF Television:

ITU Region 1 allocations and footnotes	South African allocations and footnotes	Typical Applications	Notes and Comments	Summary of analysis (to be deleted)
	614-694 MHz BROADCASTING	DTT Broadcasting (470-694 MHz)	<p>Broadcasting Allotments in accordance with GE89 and GE06. Broadcast assignments in accordance with the latest version of the Terrestrial Broadcasting Frequency Plan as amended (GG No.36321) 02 April 2013.</p> <p>Radio Frequency Spectrum Assignment Plan, GG 43341 Notice 284 of 2020</p> <p>Band IV/V Analogue television is to be migrated to digital television and ensure harmonisation with SADC.</p> <p>The use of Television Whitespaces in the band 470 – 694 MHz excluding sub band 606 to 614 MHz, subject to non-Interference</p>	<p>DCDT Ministerial Notice of 28 Feb 2022 confirming 31st of March 2022 as the end of dual illumination period and the Analogue Switch-Off (ASO) date..</p> <p><a href="https://www.dcdt.gov.za/images/Minister-">https://www.dcdt.gov.za/images/Minister-</a></p>

5. eMedia notes that the Draft Radio Frequency Plan proposes the removal of UHF analogue TV completely from the bands 470 -694MHz, as well as 694-854MHz. This amendment is extremely problematic considering that currently approximately 3.8 million television households still access television via analogue platforms<sup>1</sup>. Any premature removal, particularly given what is set out below regarding ASO would be irrational, unlawful and subject to review.
6. eMedia is concerned that the amendment, before analogue switch off (ASO) is premature. Furthermore, the question as to when or whether ASO happens is uncertain given the various issues in relation to the implementation of ASO.
7. The Authority would be aware of the ongoing, numerous problems associated with the Broadcast Migration Project which has largely failed in its attempts for proper registration and installation of government subsidies set-top-boxes and has low levels of awareness of digital migration.

<sup>1</sup> Broadcast Research Council (as at

8. In March 2025, the Minister and the Department of Communications and Digital Technologies was interdicted by the High Court from switching-off analogue television signals. The terms of the court order are as follows:
- 8.1. *“The operation of the final analogue switch-off date of 31 March 2025, as announced by the Minister of Communications and Digital Technologies on 5 December 2024 is suspended;*
- 8.2. *The Minister of Communication and Digital Technologies Technology is interdicted from taking any steps to implement the switch-off of analogue signals and ending dual illumination; and*
- 8.3. *Sentech SOC Limited is interdicted from taking any steps to implement the switch-off of analogue signals and ending dual illumination.”*
9. The terms of the court order are clear. Moreover, the litigation between eMedia and others against the Minister and Department has still not been finalised .
10. This means that analogue television is currently here to stay for the foreseeable future and any premature removal of analogue television from the Draft Frequency Plan cannot be sustained or justified unless or until, ASO is a certainty which it is not. eMedia has presented the problems with ASO to the Authority numerous times, most recently during the hearings into the draft DTT Regulations.

## FM Band:

ITU Region 1 allocations and footnotes	South African allocations and footnotes	Typical Applications	Notes and Comments	Summary of analysis (to be deleted)
5.190		Digital sound broadcasting (DSB); services: DRM+	published in GG44469 Notice 215 of 2021  GG 43514 Notice 759 of 10 July 2020, GG 44469 Notice 215 of 23 April 2021, Digital Sound Broadcasting Services Regulations, 2021  ITU-R BS.1114-7 (2019) ITU-R BT.1872 (2010)	ICASA/Sentech DRM+ FM-band trials (2014–2015) proved technical viability in local conditions.  International precedent: India, Pakistan, China, Indonesia: active DRM rollouts (mainly DRM30, but DRM+ recognised for FM). European trials: Germany, Switzerland, and others tested DRM+ in the FM band
100-108 MHz  BROADCASTING	100-108 MHz  BROADCASTING	FM Sound Broadcasting (87.5-108 MHz) Digital sound broadcasting (DSB); services: DRM+	The Terrestrial Broadcasting Frequency Plan (GG no.36321) 02 April 2013 Geneva agreement GE84  GG 43514 Notice 759 of 10 July 2020	ICASA/Sentech DRM+ FM-band trials

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Company Secretary: HCI Managerial Services

11. eMedia further notes that DRM+ was added to the FM bands 87.5-108.0.
12. While eMedia has no concerns regarding the addition of DRM+, it is concerned about the possibility of interference with existing services if planning is not done properly and urges the Authority to ensure that any roll-out of DRM+ is done with proper coordination.

**Conclusion:**

13. eMedia thanks the Authority for the opportunity to comment on the Draft Radio Frequency Plan and looks forward to participating in any hearings should this be deemed to be necessary in view of what is set out herein.
14. eMedia remains concerned about the possibility of the removal of analogue television from the bands 470 to 694MHz as well as 694 to 854 MHz and holds the view that removal in the current circumstances will be unlawful. For the reasons set out above, analogue television cannot be excluded from the Frequency Plan.
15. We remain at your disposal to discuss what is set out herein.

Yours sincerely,



Philippa Rafferty / Junior Qwabe

eMedia Investments