

Ham Radio Outlet-SA cc T/A

HRO-SA Communications

Your Two-Way Radio Specialists

CK 2005/097206/23

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4 October 2010

To: ICASA
Attention: Mr Manyapelo Richard Makgotlho

Dear Richard,

Draft Gazette on Radio Communications Published 29 September Refer:

As the owner of one of the larger Radio Communications dealerships in the Eastern Cape and the largest dealer of amateur radio equipment in South Africa and as a Amateur Radio Operator (ZS2DL) for more than 20 Years I feel it my duty to reprimand ICASA and a very poorly drafted Gazette.

Unfortunately the draft is so poor, that it should be scrapped and redrafted.

The Following are my most urgent concerns on the proposed Draft not only as a Amateur Radio Operator but as a Commercial/Amateur Radio dealer. I also have several Communal Repeaters so I feel I am in the position to comment on the entire Gazette.

It is clear to me that nobody with technical background had anything to do with this draft.

Herewith my observations:

Section 8 Paragraph 6:

Impossible. Especially in terms of Communal Repeaters where you are granted a radius of 50kms. Anyone with technical background will tell you that in practice no matter how hard you try this is impossible to prevent.

Section 9 Paragraph 2

How do we as service providers explain to our customers that after 5 years our licence may not be granted again or we must re apply and possible be issued with different frequencies rendering the radio apparatus unusable? We have also entered into agreements with landlords for co location on high sites where by impact studies had to be paid for to ensure that our issued licenced would not hinder their communications spectrum. Is ICASA going to pay for new studies to be done ever 5 years? We as dealers wont.

Section 9 Paragraph 3

Amateur licence for 15 years and the re apply. I don't think so. Your organization cannot even cope with its current licensing activity in an efficient manner, are you going to cope with 15000 licences in a period of six weeks every 15 years.

You also miss the entire concept of holding and amateur licence. The callsign issued becomes a IARU recognised allocation for the individual and there will be major issues if these licences at renewal are not issued exactly as they were before. WHO thought of this rubbish?

Part VII 26.1

In terms of international law and regulations to which South Africa are signatories ICASA may not simply change Band Plans. There are Satellite devices etc that you do not control that operate in certain areas of the spectrum. More on this when I deal with "Free Tuning"

Section 28 1

ICASA Radio dealers licences are not worth the paper it is printed on. There are no regulations pertaining to the standards set out for the issue of said licence. As a result anyone can masquerade as a dealer and do more harm than good.

Section 28 2 to 8

It is all very well that your intentions are good with these regulations. However it is my experience that anyone with a credit card and the internet can now purchase radio equipment without licence from overseas dealers and e Bay and it passes through customs without any questions being asked. Where is the protection of the local dealers trying to operate in an honourable manner?

Section 29 2

Once again the person drafting these regulations have lost the plot completely. There has to be checks and balances and the scraping of the restricted class A licence is very concerning as most of these people that have just written the exam have no operating experience and now find they are allowed to operate very sophisticated radio equipment and are ambassadors of South Africa and have no idea what they are doing. The restricted Class a or ZR licence was always seen as an apprenticeship, WHY mess with something that is working?

Section 29 10

So a listener may now own transmitting equipment???
There goes the spectrum for more illegal use!!!!

Section 29 20

Many amateur radio operators give of their own time to volunteer for disaster management and aid emergency services. If their radio equipment is not "Tuned" to the correct frequency how will they communicate???

Section 29 33

What about losses? The correct place to measure output power is where the feeder cable enters the antenna. I suggest you will have a lot less inspectors if this were the case as to many of them are too fat to climb towers.

Section 29 34

What about high sites where there is no mains current and "Filtered DC Power Supplies" cannot be used. Must we just scrap Solar/wind turbine and battery sites. I fear this could render not only amateur but commercial networks useless!!!!!!!

Section 30

What a joke. What about the latest Digital technology whereby digital repeaters can be linked using VOIP technology rather than Frequency spectrum?

Section 40 .1

This is a major problem to amateur radio operators as all modern VHF UHF Mobile and handheld transceivers have RX capability outside of the allocated amateur bands. You may have civil unrest on your head should they not be granted exemption from this regulation.

Section 42 1

By recognising foreign radio licences you recognise that they may be issued restricted licences. Hence you need to adhere to those restrictions. Yet in South Africa there will no longer be a restricted form of licence if this gazette is published. Once again you are contradicting yourself.

These above I feel are enough proof that the proposed Gazette is fundamentally flawed and should be scrapped.

I do believe that the amateurs representative body the South Africa Radio League will make a presentation about the issues but please note that it is Radio Dealer / Amateurs/ Commercial users of the spectrum that find this document most concerning.

Also it should be noted that there is an international directive that states only adequate power levels to be used to ensure adequate 2 way communication. Hence it is time the authority amend Amateur power allocations up from 26dBw to more in the order of 30 dBw on the 0-30Mhz spectrum as it is no longer a portion of the spectrum of financial interest to government and the fact that Solar Cycle 24 has intrinsically indicated that 26dBw may no longer be enough to ensure good quality communications in this portion of the spectrum.

Also a transmitter may need to exceed the allocation of 26dBw to counter filter and feeder losses.

Sir I am afraid it is back to the drawing board for you and your team.
I wish you luck in your endeavours and we will continue to watch vigilantly what you are doing with our most precious resource. The Radio Spectrum.

Yours in Communication

Donovan van Loggerenberg, ZS2DL
Member Ham Radio Outlet SA cc
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Member South African Radio League / American Radio Relay League

"Where Radio is a Passion"
Members: D.van Loggerenberg, C.Pryce Lewis