

Attention: Mr Mandla Mchunu
Manager: Spectrum Management
ICASA
Block A
Pinmill Farm
164 Katherine Street
Sandton

By e-mail: mmchunu@icasa.org.za

29 May 2009

Dear Mr Mchunu

Representations on draft Radio Frequency Spectrum Fees Regulations

- 1 Orbicom would like to thank the Authority for the opportunity to comment on the draft Radio Frequency Spectrum Fees Regulations ("the draft Regulations"), gazetted on 16 March 2009.
- 2 We would further like to commend the Authority on the quality of the Discussion Document and the draft Regulations. Furthermore, we agree with the policies formulated by the Authority concerning spectrum fees.
- 3 We have only one substantive comment to make, and that relates to the increase in the Unit Price per MHz paired, from R770 to R2 000.
- 4 Orbicom has calculated the total spectrum fees it would pay under the present fees structure, and has compared it with what Orbicom would have to pay in terms of the draft Regulations. Comparing those two figures, the proposed increase in the Unit Price results in an increase in the total fees to be paid by Orbicom of well over 100%.

We submit that this is an inordinately high increase, particularly in the current economic climate, and request the Authority to reconsider this Unit Price.

Yours Sincerely

Calvo Mawela