

Definitions:

“KHz” means **Kilohertz** of Radio Frequency Spectrum;

The correct spelling is kHz and kilohertz. The spelling of the word hertz in the abbreviated format as “Hz” is an international convention for a unit named after a person, in this case Heinrich Rudolf Hertz

Section 8

(1) the licensee must use or operate only **approved apparatus** in the spectrum specified in the Radio Frequency Spectrum Licence;

“Approved Apparatus” is not specified in the Definitions section. Currently there is no type approval required for amateur apparatus.

(5) **the licensee must ensure that all apparatus causing harmful interference to cease operation until such time when the harmful interference has been eliminated;**

This isn't english and is a meaningless statement. We believe that what was intended is:

The licensee shall ensure that any apparatus causing harmful interference shall be withdrawn from service until such time it has been certified by a competent authority that it has been rectified satisfactorily.

Section 9 (3) The time limit of 15 years for an amateur licence is not acceptable.

Section 29 Amateur Radio Regulations

(12) the use of the word “**authorize**” is incorrect.

The documentation standard adopted by the government of the Republic of South Africa for all official documents is to use English. The spelling of the word “authorize” is American English and hence inappropriate for this document. The correct spelling is “authorise”. This incorrect spelling is noticeable throughout the document.

(16) Keeping of log book

The road traffic act prohibits a person in charge of a vehicle to write whilst the vehicle is in motion. Hence, the clause needs to have appended “or whilst operating from a mobile station”.

(17) e the frequency **band** that is used; provided that it **needs** to be recorded in the log book only once until a change of frequency to another **authorized** band takes place.

The preferred wording should be “frequency” omitting the word “band”. In cases when interference occurs it is often useful to have the exact frequency that was used rather than the band.

(33) The maximum power output of the transmitter, as measured at the **antenna port**, shall not exceed the levels specified in the national radio frequency plan for the relevant licence class **and linearity shall be maintained.**

“Antenna Port” is not defined in the Definitions section. The need to maintain linearity only applies to single sideband transmitters, transmitters operating using frequency modulation (FM), carrier wave (CW) and amplitude modulation are generally operated in Class C, which is a non-linear amplification method.

(36) The antenna system shall furthermore comply with the requirements of the relevant local municipality.

We respectfully submit that ICASA has no jurisdiction in this matter and it is covered under another act.

Page 51 & 55      Technical Requirements (System Design)

The frequency on which the radio apparatus operates should read MHz, not Hz. Similarly the occupied bandwidth should be stated in kilohertz (kHz) not MHz.

Page 57      Application Fees

The recently published fees structure for the amateur licence was stated to be R120-00 per annum. The table on page 57 shows this to be R140-00.

Another query pertains to the mechanism to migrate from the 31<sup>st</sup> December to 31<sup>st</sup> March. What means will be used to fill in the 3 months when this occurs? Is it the intention to issue a renewal notice for 3 months or will the extra 3 months be added pro-rata to the new licence renewal account?