

SOUTH AFRICAN INTRUDER DETECTION SERVICES ASSOCIATION

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Registered as a security service provider by the Private Security Industry Regulatory Authority,
Registration Number 1347967

JB/br/181110

18th NOVEMBER 2010

By E-Mail: rmakgottlo@icasa.gov.za

ICASA
Block A, Pinnacle Farm
164 Katherine Street
Sandton
2146

ATTENTION: MR R MAKAGOTLHO

Dear Sir,

RE : **SUBMISSION ON DRAFT RADIO FREQUENCY SPECTRUM REGULATIONS**
(Published in the Government Gazette No. 33590 of 29 September 2010)

The South African Intruder Detection Services Association (SAIDSA), on behalf of their 200 member companies involved in the installation and monitoring of 80% of all intruder alarm systems in South Africa, hereby submit a written submission on the above draft regulations. Furthermore, SAIDSA wishes to partake in Oral submissions on 01 and 02 December 2010, such date and time to be confirmed by ICASA.

SAIDSA wishes to comment on a number of issues of concern to its member companies. While SAIDSA and its members acknowledge the regulatory powers of ICASA, we remind ICASA of the importance of prior consultation with the industry who should be acknowledged as experts in their field in the practical implementation of Radio Communications to a control centre.

SAIDSA wishes to summarize and place on record the following concerns highlighted below, which will be the subject of more in-depth discussions within their oral submission.

1. Concern over the increase to 20,000, being the required number of transmitters considered to fully populate a frequency. (Ref: 31.6)
2. Problems regarding the practical implications and control with regard to the sharing of frequencies, especially where the same frequency is issued within a distance of less than 150km. (Ref: 23.1,2,3 and 31.2)

3. **Accountability and responsibility issues with regard to frequency sharing in terms of responsibility of network interference, high site repeater maintenance, lock-ons, clashing and loss of signals in peak times. (Ref: 25.1.1-4 and 31.2-7)**
4. **The issuing of exclusive frequencies for multi-user networks and large companies must be retained.**
5. **The disclosure of confidential information as required in the collaboration between companies sharing frequencies is in conflict with the "Access to Information Act" (31.2)**
6. **The "auctioning off" of unused frequencies may be considered as "unfair practice" in the eyes of the Competitions Board. (Ref: 17.1)**
7. **Where reference is made to disadvantaged ownership required to be eligible for a frequency, this is in conflict with the BEE Act and may prejudice small companies who already comply with the Act in terms of turnover and small compliant (Annexure D (4))**
8. **The expiration of a licensed frequency after a 5 year period is of concern to all as continued use of an assigned frequency is critical to the correct and continuous operation of a control centre. (Ref: 9.1, 9.2, 9.5, 9.6, 9.7)**
9. **Unreasonable restrictions on the transfer of a Radio Frequency Spectrum. (Ref: 12.4)**

We trust that ICASA will take serious cognisance of the above concerns for discussion in the interest of National security.

Please note that SAIDSA hereby reserves all rights, and in particular that should the above not be dealt with to the reasonable satisfaction of SAIDSA's member companies with regard to practical implementation, SAIDSA will consider vigorous legal action against ICASA, as well as its office bearers in their personal capacities. We trust however that this will not be necessary.

**Yours Faithfully
J BOOYSEN (B-Eng)
SAIDSA
CHAIRMAN : CENTRAL REGION**