



29 February 2012

To: ICASA  
Attention: Ms Yolisa Kedama  
By e-mail: [ykedama@icasa.org.za](mailto:ykedama@icasa.org.za)  
From: Karen Willenberg

Dear Madam

**SUBMISSION ON THE DRAFT ITA AND DRAFT SPECTRUM ASSIGNMENT PLAN FOR THE COMBINED LICENSING OF 800 MHZ AND 2.6 GHZ BANDS**

1. M-Net would like to thank the Authority for the opportunity to make representations on the draft ITA and draft spectrum assignment plan for the combined licensing of 800 MHz and 2.6 GHz bands.
2. We understand that the purpose of digital migration is to secure the release of the digital dividend, part of which comprises the freed spectrum from 790-862 MHz. We have, on numerous occasions, argued to the Authority that the focus in all migration processes should be to ensure a swift migration and enable the release of the dividend in the shortest possible time.
3. The spectrum in the 800 MHz bands will only be released once the analogue signal has been switched off. It is therefore very concerning that the Authority plans to license spectrum in the 800 MHz bands and to encourage successful applicants for this spectrum to start using it before the migration is complete.
4. M-Net fully endorses the submission made by Orbicom, in particular that the spectrum plan be finalized closer to the analogue switch-off date, when there is likely to be greater certainty as to the actual spectrum in the 800 MHz bands which will be freed for licensing.
5. The Authority's proposals introduce additional complexity to an already complex migration process. This can only result in adverse consequences for everyone involved in migration ( the broadcasters, the parties to whom the freed spectrum in the 800 MHz bands has been licensed and the Authority).
6. It will be detrimental to the process of migration if Authority allowed non-broadcasting services to be offered in the 800 MHz bands before the analogue switch-off date.

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7. We trust the Authority will give due consideration to the adverse impact of its proposals on the broadcasting sector.

Yours sincerely

  
KAREN WILLENBERG