



SUBMISSION BY SENTECH LIMITED

ON THE

**DRAFT SPECTRUM ASSIGNMENT PLAN FOR THE COMBINED LICENSING OF THE
800 MHZ AND 2.6 GHZ BANDS AS PUBLISHED UNDER NOTICE 912 IN GOVERNMENT
GAZETTE 34872 ON 15 DECEMBER 2011**

29 FEBRUARY 2012

Sentech Mission Statement

“To enable affordable universal access to communication services in the context of South Africa’s socio-political imperatives as a developmental state.”

<http://www.sentech.co.za/>

1. Introduction

- 1.1 Sentech thanks the Independent Communications Authority of South Africa (“Authority”) for the opportunity to make a submission on the *Draft Spectrum Assignment Plan for the combined licensing of the 800 MHz and 2.6 GHz bands (“Draft Spectrum Plan”)* as published on 15 December 2011 in Government Gazette No 34872 under Notice 912.
- 1.2 Sentech further indicates its willingness to participate in any public hearings that the Authority may hold on the matters raised in the *Draft Spectrum Plan*.

2 General

- 2.1 Sentech is in agreement with the proposals as indicated in the Draft Spectrum Plan with regards to the facilitation of spectrum assignment and migration proposal for Sentech.
- 2.2 Sentech interprets that the proposal from the Authority will be effective on final publication of the Spectrum Plan.
- 2.3 Sentech would like to bring to the attention of the Authority that the bands 800 MHz and 2.6 GHz have been allocated for Mobile services, including IMT services, except aeronautical mobile services.
- 2.4 Sentech is therefore of the view that the Draft Spectrum Plan should consistently express the above.
 - 2.4.1 It is deliberation on the Draft Spectrum Plan, the authority should also take cognisant of the ITU WRC-12 decisions, namely:
 - 2.4.1.1 **Footnote 5.3XX** *In Region 1, the use of the band 694-790 MHz by the mobile, except aeronautical mobile, service is subject to the provisions of Resolution COM5/10 (WRC-12).*
 - 2.4.1.2 Resolution COM5/10 (REV. WRC-12); and

2.4.1.3 Resolution 224 (REV.WRC-12)

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| 3 Purpose |
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3.1 In terms of *Section 2: Purpose* of the Draft Spectrum Plan, Sentech proposes the following changes;

3.1.1 Sentech proposes that Section 2.1(i) should be removed as the allocation was done through the *National Radio Frequency Plan as published on 30 July 2012 in Government Gazette No. 334 under Notice No. 727.*

3.1.2 Section (iii) to become (iv) and the following changes are proposed;

3.1.2.1 *(iii) Facilitate the migration of Sentech and Neotel to enable an effective spectrum plan in the bands 800 MHz and 2.6 GHz.*

3.1.2.2 Section (v), previously (iv), to be amended as following;

3.1.2.2.1 *Set out the procedures and timetable to be followed for the assignment and licensing of successful applicants.*

3.1.2.3 Section (vi), previously (v), to be amended as following;

3.1.2.3.1 *The apportionment of the 800 MHz and 2.6 GHz bands for Mobile except aeronautical mobile services.*

3.1.2.3.2 The EC Act is technology neutral and the amended intends on capturing that.

3.1.2.4 Section (vii), previously (vi), to be amended as following;

3.1.2.4.1 Give detailed frequency channelling arrangements taking into consideration ITU Resolution *Com 5/10 (WRC-12): Use of the frequency band 694-790 MHz by the mobile, except aeronautical mobile, service in Region 1 and related studies.*

4 The Policy Objectives and Motivation

4.1 Section 4.6 should be amended as following;

4.1.1 *The 800 MHz and 2.6 GHz bands have been identified worldwide for Mobile except aeronautical services which should provide for mobile broadband wireless access.*

5 Licensing Philosophy

5.1 Sentech is in agreement with the Authority that the combined licensing principle should be implemented on a “Wholesale Open Access model”.

5.2 Sentech interprets the “no locking”, “no blocking” and “no retail” as meaning an Integrated Open Access Model.

5.3 Sentech interprets Section 5.4 as relating to wireless devices.

5.4 Therefore the “no locking” will then be interpreted as meaning that the network should allow for wireless device agnosticism.

5.5 Section 5.10 should be amended as following;

5.5.1 *Designated Mobile except aeronautical bands in this plan refer to 790 – 862 MHz (800 MHz), 880 – 915/925 – 960 MHz (900 MHz), 1710 – 1785/1805 – 1880 MHz (1880 MHz), 1920 – 1980/2110 – 2170 MHz (2100 MHz) and 2500 – 2690 MHz (2.6 GHz) bands.*

6 Frequency Channelling Arrangement

- 6.1 In terms of the Draft Revision of Recommendation ITU-R M.1036-3: *Frequency arrangements for implementation of the terrestrial component of International Mobile Telecommunications-2000 (IMT-2000) in the bands identified for IMT in the Radio Regulations (RR)*, ICASA is proposing a paired frequency arrangement in line with A3 of Table 2: *Paired Frequency arrangements in the band 698-960 MHz*.
- 6.2 Even though Resolution COM5/10 (REV. WRC-12) is calling for studies for channelling arrangements for the mobile service in the band 694 – 790 MHz, inter alia, the channel arrangement in terms of ITU R M.1036 will be considered.
- 6.3 Taking into consideration that the studies under COM5/10 (REV. WRC-12) are yet to be finalised, Sentech believes that ICASA can also consider the frequency arrangement A4 or A6 of Table 2: *Paired Frequency arrangements in the band 698-960 MHz* together with A3 for future consideration.
- 6.4 The outcome of the studies is unlikely going to affect the band above 790 MHz.

7 The Current Status of 800 MHz and 2.6 GHz Bands

7.1 Sentech would like to draw the attention of the Authority that the band 800 MHz is currently used for the following broadcasting services;

7.1.1 Studio Transmission Links Services

7.1.2 Lower Power Analogue Television Services

7.1.3 Self-help Analogue Television Services and

7.1.4 High and Medium Power Analogue Television Services and

7.1.5 DTT Services

7.2 With respect to the above, Sentech will endeavor to assist the Authority in the frequency migration process in order to determine the possibility of portions of the 800 MHz bands being made available prior to the finalization of the DTT migration process on a small scale basis.

7.3 The above is in line with Section 7.2 of the Draft Spectrum Plan.

8 In-band Migration in 800 MHz and 2.6 GHz bands

8.1 Sentech agrees with the Authority's proposal in Sections 8.7.1, 8.7.2 and 8.7.3;

8.2 Sentech interprets the proposal in Sections 8.7.1, 8.7.2 and 8.7.3 to be effective on final publication of the Spectrum Plan.

9 The Spectrum Assignment Plan and Licensing Framework

9.1 Sentech agrees with the Authority's proposal in Sections 9.1.1 and 9.2.2;

9.2 Sentech is also in agreement with the Authority's proposal in Section 9.4.4;

10 Conclusion

- 10.1 Sentech thanks the Authority for the opportunity to make a submission on the Draft Spectrum Plan.
- 10.2 Sentech further indicates its willingness to participate in any public hearings that the Authority may hold on the matters raised in the *Draft Spectrum Plan*.
- 10.3 Sentech is in agreement with the proposals as indicated in the Draft Spectrum Plan with regards to the facilitation of spectrum assignment and migration proposal for Sentech, namely section 8.7.1, 8.7.2, 8.7.3, 9.1.1, 9.2.2 and 9.4.4.
- 10.4 Sentech interprets that the proposal from the Authority will be effective on final publication of the Spectrum Plan.
- 10.5 Should the Authority require any clarity or elaboration on this submission the Authority should contact Mr Thato Toko on 011 691 7220 or tokot@sentech.co.za