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GSMA RESPONSE TO ICASA DRAFT FREQUENCY MIGRATION REGULATION AND FREQUENCY MIGRATION PLAN

The GSM Association (GSMA) thanks the Independent Communications Authority (ICASA) for the opportunity to provide comments on the proposed frequency migration regulations and frequency migration plans in the Republic of South Africa.

EXECUTIVE SUMMARY

As the mobile telecommunications industry continues to grow, policy development challenges arise, both nationally and internationally. These challenges frequently highlight the need to develop a better understanding among governments of the role and operating model of private enterprise in a modern society. The GSMA is the world trade association of mobile operators. With 800 members in 220 countries, generating annual revenues in excess of One Trillion US Dollars, the GSMA has a pivotal role to play in the development of public policy and regulation relating to the mobile industry and its customers.

The GSMA would like to congratulate South Africa on its extraordinary success in GSM mobile telecommunications. With that experience as a base it is time to repeat the success with Mobile broadband access, which has the potential to profoundly stimulate economic growth and social development in South Africa for many years to come.

GSMA COMMENTS ON ICASA'S DRAFT MIGRATION REGULATIONS AND MIGRATION PLANS:

1. (Section 3.3.2) The GSMA believes that the Radio Frequency Spectrum Assignment Plan should contain a specific time scale (with hard deadlines) for the reallocation of the radio frequency band in question, specifying the date at which the users to be migrated should cease transmission¹. The GSMA believes it is not sufficient for ICASA to simply state that the "time frame for a process of spectrum migration should be 3-5 years from the moment of announcement."
2. (Section 4.11.25) In keeping with WRC resolution 225, the band 1980-2010MHz should be retained for the satellite component of IMT and fixed links should be migrated to frequencies above 3 GHz.
3. (Section 4.11.28) The band 2300 -2400MHz should be allocated for IMT terrestrial in line with the ITU Region 1 allocation and SADC FAP. Fixed links should be migrated to frequencies above 3 GHz.

¹ ITU ASO Guidelines Section 2.16 p.116-120;

GSMA Digital Dividend Toolkit Section 4.1 Case Studies: <http://www.gsma.com/spectrum/digital-dividend-toolkit/>