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27 September 2012

ATTENTION: Paseka Maleka

ICASA
Pin Mill Farm
164 Katherine St
Sandton
2196

Dear Paseka,

RE: DRAFT RADIO FREQUENCY MIGRATION REGULATIONS AND FREQUENCY MIGRATION PLAN FOR PUBLIC COMMENTS BY MIMOTECH

In accordance with the call for public comments, please find the following submission from MIMOftech (Pty) Ltd, a South African developer and manufacturer of ultra high capacity broadband wireless solutions. The comments refer to Paragraph numbers of the Government Gazette No. 35598 of 17th August 2012.

1 Para 4.11.37 – 40000 MHz and above

The comment made under the paragraph does not adequately cover the opportunity.

Technology is available to make use of frequencies above 40 GHz for ultra high capacity point-to-point backhaul solutions as alternatives to fiber and other technologies. These technologies are required to fulfill the roll out of fixed and mobile broadband wireless networks.

Currently, the choices available to operators are limited to narrowband (i.e. less than 28 MHz channels) in the traditional microwave bands up to 40 GHz as these links are far more cost effective in terms of annual spectral licensing fees in spite of the their limited usage capacity (a function of the narrowband channel).

The issue to stimulate frequency use above 40 GHz, thereby reducing somewhat the congestion in urban areas for frequency bands below 40 GHz, is the issue of spectral licensing fees. In the bands above 40 GHz, typical channel sizes used are 250 MHz and greater to achieve the higher throughputs (typically above 1 Gbit/s). With the same pricing regime as below 40 GHz (the FREQ factor); the operating costs of these links is just not economical.

What is required is either a further category in the FREQ factor table whereby fixed links in frequency bands above say 50 GHz may use a factor around 1/10 of the present factor (i.e. 0.005 as opposed to 0.05) or to adopt a "light-licensing" regime as has been done in other countries.

This small change to the pricing structure will provide a very necessary incentive to make use of spectrum that is prohibitively priced currently; thereby encouraging network operators to revisit the choice for micro, pico and femto-cell backhaul for their mobile networks to make use of wireless as opposed to fiber technologies with their associated costs and implementation delays.

We look forward to further debate and deliberation on this matter.

Yours faithfully
For **MIMotech (Pty) Limited**

A handwritten signature in black ink, appearing to read 'Geoff Carey', with a long horizontal stroke extending to the right.

Geoff Carey
Director