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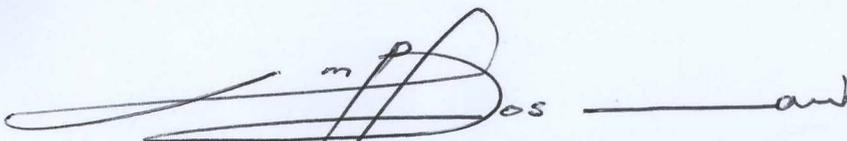
SOUTH AFRICAN POLICE SERVICE SUBMISSION ON THE DRAFT FREQUENCY MIGRATION REGULATION AND FREQUENCY MIGRATION PLAN.

1. The South African Police Service as established in terms of the South African Police Service Act 68 of 1995 has a significant responsibility in providing safety and security for all citizens.
2. The South African Police Service is recognized in the Electronic Communications Act in various Sections as a Security Service and in Section 30(2)e the authority is sensitized to give due regard to the spectrum allocated to the Security Services.
3. Also in Section 34(2) the legislator requires the Minister take the spectrum of security services into account when considering frequency allocation plans.
4. Against this background, the SAPS supports the principles proposed in the regulations and frequency migration plan, but needs to point out the practical and financial implications of the intended migration and herewith draws the attention of the authority to the following issues:
 - 4.1. In relation to the bands 406 to 430 MHz and 380 MHz to 400 MHz, the SAPS has already begun a process of migration. The reality however is that the scale of SAPS radio usage is such that the migration completion will require the development of approximately 1000 radio sites, in order to make the SAPS infrastructure ready for the 380 to 400 MHz technology and the financial implication will be in the range of R 7000 Mil to 10 000 Mil or more.
 - 4.2. At the current rate of funding, the migration can only be completed in a period of 35 to 40 years.
 - 4.3. The typical economic life expectancy of radio infrastructure used by SAPS is in the order of 15 years as opposed to the 5 years estimated in par 3.3 and sub sections of notice 606 of 2012.
5. In view of the above the SAPS proposes that the migration timeframes be adjusted to take cognisance of the financial and other practical realities impacted by the proposed migration regulations.

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6. Regarding the 450 MHz to 470MHz band and other digital dividend bands, the attention of the regulator is drawn to the USA developments where spectrum was set aside for first responders in terms of the US Broadband for first responders act in the 700 MHz band. The public safety entities in South Africa do however also have a significant rural safety responsibility and would benefit from use of 450MHz to 470 MHz as a better alternative when considering propagation characteristics.
7. In either of the sub 1GHz digital dividend bands, provision should be made for dedicated public safety broadband, ideally guiding public safety users to build a shared infrastructure or at least standardise on one standard technology.
8. The SAPS would appreciate an opportunity to further consult on the broadband matters with ICASA.

Kind Regards

A handwritten signature in black ink, appearing to read 'm p Bosman', written over a horizontal line.

BRIGADIER

**SECTION HEAD: RADIO NETWORK INFRASTRUCTURE MANAGEMENT
GM BOSMAN**

DATE: 20/2 - 09 - 28.