



**ESOA Response to the
Public Consultation published by ICASA:**

**“Second Draft Frequency Migration Regulation and Radio Frequency Migration
Plan”**

and

“The Draft Update of the National Radio Frequency Plan”

To the attention of:
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Dear Mr Makgotlho,

The European Satellite Operators Association (ESOA) provided comments to ICASA in response to the first draft of the Frequency Migration Plan in September 2012. Those comments responded to ICASA's proposals related to several bands used by satellites services, in particular the C-band FSS frequencies (3400-3800 MHz), the 1.5/1.6 GHz MSS frequencies (1518-1559 MHz, 1626.5-1660.5 MHz and 1668-1675 MHz), and the 2 GHz MSS frequencies (1980-2010 MHz and 2170-2200 MHz).

ESOA is pleased to note that ICASA has modified some of its proposals in the migration plan such that the continued use of most of the above bands by satellite applications in South Africa is assured. ESOA sincerely thanks ICASA for making those changes.

However, there remain two issues of concern to ESOA, which are identified below.

1. 1518-1525 MHz

In the Second Draft Frequency Migration Regulation, in section 4.10.21, ICASA notes that the original proposal was to migrate fixed links (repeater links for LMR and outside-broadcast links) into the band 1518-1525 MHz. However in the new proposal presented by ICASA, fixed links would not be migrated into this band. ESOA fully supports that fixed links are not migrated into this band and therefore supports the new proposal.

However in the Draft Update of the National Radio Frequency Plan, the listed typical applications for this band include “Single Frequency Links (1517-1525 MHz)”. As there is apparently no existing use of the band for fixed links, and as ICASA has confirmed that there is no plan to migrate fixed links into this band, the reference to fixed links in the National Radio Frequency Plan seems to be misplaced. We suggest that the reference to fixed links as a typical application in this band should be removed.

2. 1525-1530 MHz

The Second Draft Frequency Migration Regulation (section 4.10.22), records that the original proposal was to migrate fixed links (e.g. repeater links) into the band 1525-1530 MHz. The outcome of the first consultation is stated as the following:

“Current usage by INMARSAT needs to be further evaluated. The proposal for no change would be based upon the current levels of usage. If deemed low utilization then 1525 -1530 MHz will be used for simplex fixed links only.”

ESOA understands that Inmarsat will be providing information directly to ICASA in response to this issue. However ESOA wishes to underline that this is a long-standing MSS band, which is very well harmonised for MSS use throughout the world and continues to be in use by several MSS operators. ESOA would be opposed to any new terrestrial use of this band, and suggests that the Second Draft Frequency Migration Plan and Radio Frequency Migration Plan is modified accordingly.



ESOA thanks ICASA for the clear and open consultation process and thanks ICASA for the positive outcome to the consultation on the first draft migration plan. ESOA has above identified two outstanding issues for which we request further changes to the Migration Plan and to the National Radio Frequency Plan.

Yours sincerely,

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