



For the Attention: Mr. Manyapelo Richard Makgotlho
The Independent Communications Authority of South Africa
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07 February 2013

Input to :

The Draft Update National Frequency Plan published on 24 December 2012

The 2nd Draft Frequency Migration Regulations and Frequency Migration Plan, published by ICASA on 28 December 2012 following the initial drafts published and the hearings held in August 2012

Dear Sir,

Globecomms Systems South Africa (Pty) Ltd, as a Distribution Partner of Inmarsat services, would like to take this opportunity to present our grave concern regarding the proposal in the section 4.10.22 of the Second Draft Frequency Migration Plan, with particular respect to the intent to reallocate 5 MHz of Inmarsat spectrum exclusively to simplex fixed links.

Inmarsat, as the network operator and manager of the resource, is providing input with regard to the procedures for international allocation of L-band as well as to how the network and satellite beams use the particular band 1525 -1530 MHz. This will explain the technical and regulatory reasons for the negative impact on an area that stretches far beyond the borders of South Africa and includes airspace and international waters and affects other mobile satellite systems.

In support and in addition of this, Globecomms would hereby like to present evidence of our Inmarsat business nationally as well as regionally in reply to ICASA's statement that;

"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."

Evidence –

- The frequency range is employed by many of Globecomms customers, including branches of the South African military and various governmental organisations, with services deployed on land, at sea and in the air.
- The change in frequency allocation would impact our customers making use of any the Inmarsat satellite phone and broadband services affecting many ships, aircraft and terrestrial users.
- A reallocation of the spectrum would further impact many remote and quite often unmanned locations in isolated rural areas where Inmarsat solutions have been deployed as the only available means of communications to users.
- The spectrum is also made use of for Supervisory Control and Data Acquisition (SCADA) applications, many of which transmit very critical information, e.g. for cross-country electricity distribution, water resource management, etc.

Globecomms Systems South Africa (Pty) Ltd

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Conclusion:

Globecomm requests that ICASA take into account the unique features of the service we deliver to our users via Inmarsat and the negative impact a spectrum crunch would have on the continuity, growth and investment by our suppliers and ourselves. Taking into account that there is alternative spectrum available for fixed links, we would like to request ICASA urgently

- not to migrate Fixed links into the band 1525-1530 nor any other part of L or extended L-band
- to maintain the national frequency allocation table in coherence with the proposal for “no change” in the migration plan in that band

Sincerely,

Harry Tayler
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