



SOUTH AFRICAN RADIO LEAGUE

The National Body for Amateur Radio in South Africa

P O Box 1721
Strubensvallei 1735
South Africa
Tel 011 675 2393
Fax 086 299 0566
E-mail
secretary@sarl.org.za
Website
www.sarl.org.za

Rassie Erasmus
ZS1YT (President)

Geoff Levey ZS6GRL
(Vice-president)

Riaan Greeff ZS4PR
(Treasurer)

Fritz Sutherland ZS6SF
(Secretary)

Hans van de
Groenendaal ZS6AKV

Laurie Deveraux
ZS5DL

Francois Botha
ZS6BUU

Fred Scheepers
ZS1FCS

Willem Weidemann
ZS6WWJ

Frik Wolff ZS6FZ

Johann Marais ZS1JM

Ian Laubscher ZS1LAU

Pierre van Deventer
ZS6A

Gideon Jannasch
ZS4GJA (co-opted)

Richard Makgotlho
ICASA

7 February 2013
Re: Second Draft Frequency Migration Regulations

Dear Richard

The SARL has studied the second draft of the Frequency Migration Regulations and wishes to bring the following to your attention and for urgent consideration:

As the following spectrum is used for amateur satellite amongst other services it is important that frequencies in the amateur service should match in all three regions of the ITU.

2 300 MHZ

The range 2 300 – 2 450 is used for terrestrial services, in some instance to link repeaters used for disaster communication.

This band is also used for Digital Amateur Television and Amateur Satellites. A number of international amateur CubeSat have already been coordinated in the range.

The spectrum is also used for Amateur Television from the International Space Station (ISS)

We request that extra protection is secured in the table of frequency allocation for narrow band weak signal reception in 2 300 – 2 305 and 2 320 – 2 322 MHZ ranges. This request is in line with IARU and CEPT discussion on shared access for 5G-LTE (CEPT FM52, SE24-WI40 and report 172.

In line with our previous submission (on draft 1) we request that the band remains allocated to the amateur service albeit this being as a secondary allocation.



A Member of the International Amateur Radio Union

We believe that it is of utmost importance the current users of the spectrum be protected against interference from other possible new services sharing this spectrum.

3 500 MHZ

Further to our submission in respect of the first draft, we have consulted with National Societies in CEPT part of Region 1 and Region 2 and Region 3. In line with these discussions we now request the allocation of 3 400 – 3 410 MHz on a bi-directional basis (Ground satellite and Satellite to ground). In both Region 2 and Region 3 3 400 – 3 410 MHz is allocated to the amateur and amateur satellite services.

In the USA and NATO this sub-band can have some radar use which makes it unsuitable for commercial wireless but sharing with the amateur services is not a problem – narrowband, EME and DATV,

CEPT have planned LTE Femtocells above 3410 MHz for mobile phones.

5 MHz Band

In line with our submission to the first draft, we seek retention of the current allocation 5 650 – 5 850 MHz and upgrade to primary in the band 5 650 – 5 670 and 5 830 – 5 850 MHz,

The band 5 625 – 5 825 MHz is current used for amateur data networks and disaster communication repeater linking.

We further request that the S-E and E-S restrictions be deleted. Several international amateur satellite projects are in the planning stage. It is also important that all current services in the band are protected from interference from any new service(s) that may be sharing the spectrum in the future.

WRC 12 Decision re bands above 275 GHz

Radio Amateurs request access to bands above 275 GHz on a non-interference bases with a power limit of <1 Watt. (WRC12 resolution)

We appreciate your support for the Amateur and Amateur Satellite services and look forward to your communication and a positive outcome. As stated early we believe that South Africans should co-operate with the rest of region 1 and show good neighbourliness with Region 2 and 3.

Yours sincerely

Hans van de Groenendaal
SARL Councillor Regulatory