



SUBMISSION BY SENTECH SOC LIMITED

**ON THE
DRAFT UPDATE OF THE NATIONAL RADIO FREQUENCY PLAN**

**PUBLISHED UNDER NOTICE 1060 IN *GOVERNMENT GAZETTE* 36025 ON 21
DECEMBER 2012**

**SUBMISSION DATE
15 FEBRUARY 2013**

SENTECH'S WRITTEN SUBMISSION ON THE DRAFT UPDATE OF THE NATIONAL RADIO FREQUENCY PLAN

1. INTRODUCTION

- 1.1. Sentech thanks the Independent Communications Authority of South Africa ("Authority") for the opportunity presented to make written comments on the Draft Update of the National Radio Frequency Plan ("Draft NRFP").
- 1.2. Should the Authority hold public hearings, Sentech would like the opportunity to make an oral presentation.

2. Broadcasting Band: TV VHF

2.1 Corrections

Sentech would like to bring to the attention of the Authority that RRC-06-Rev.GE89, revised 1986 analogue plan, only covers 174 – 230 MHz portion of the VHF band. Therefore any reference of GE06 for the band 230 – 254 MHz is not correct.

2.2 Digital Audio Broadcasting (DAB)

There is no reference of the GE06 DAB assignment plan, 216 – 230 MHz, in the VHF broadcasting band. Has the Authority decided not to accommodate DAB implementation by removing the allocation as included in the GE06 assignment plan?

Or is the Authority considering the technology neutrality concept by creating opportunities for technologies such T-DMB?

The Authority should note that there is no consistency between what is included the Draft NRFP and the second Draft Frequency Migration Regulation and Radio Frequency Migration Plan.

2.3 Digital Terrestrial Television (DTT) in the VHF Band

In terms of s34(5) of the EC Act the Authority is silent on the future use of this VHF Band, 174 – 238 MHz and 246 – 254 MHz, with regard to DTT services. Sentech believes that the Authority should include a footnote indicating that future allocation and/or assignment of this portion of the band is subject to consideration of Ministerial Policy Directive in terms of s3(4) of the EC Act.

2.4 470 862 MHz Band

Comments:

Sentech proposes that the Authority amend the comments stated under the band 470 – 862 MHz as indicated below;

For analogue services the broadcasting allotments are in accordance with the GE89 plan in the process conversion to GE06.

For digital services the broadcasting assignments are in accordance with the Final Terrestrial Broadcasting Frequency Plan as published by ICASA.

Resolution 232

Sentech proposes that the Authority amend Note 3 of NF9 with regard to WRC-12 as it incorrectly interprets the allocation as stated in Resolution 232. Resolves 1 of Resolution 232 is cited below for ease of reference with own emphasis;

*to allocate the frequency band 694-790 MHz in Region 1 to the mobile, except aeronautical mobile, service **on a co-primary basis with other services** to which this band is allocated on a primary basis and to identify it for IMT;*

Note 3 of NF9 incorrectly state that the co-primary allocation of mobile, except aeronautical mobiles services is “effective immediately after WRC-12”. The co-primary allocation is effective after WRC15/16 subject to;

- Refinement of lower edge at WRC 15/16; and
- WRC 15/16 specifying technical and regulatory conditions applicable based on the outcomes of the studies under by ITU-R;

STLs

Sentech would like to re-iterate its position that STLs should be allowed to continue operation in the 800 MHz band. It terms of s6.1.5 of the Draft Spectrum Assignment Plan Government Gazette No. 34872 Notice 911, the Authority has proposed the frequency arrangement A3 of Rec. ITU-R M.1036-4 (table 3) for IMT services in the

800 MHz band. Sentech therefore requests the Authority to allow STLs to operate in the bands below;

- 821 – 832 MHz; and
- 862 – 869 MHz

Sentech believes that since STLs serve mainly Community Broadcasters, they should be allowed to operate in the bands above on non-interference and no fees basis.

The disadvantage of operating STLs at higher frequency bands is that higher power transmitters and higher gain antennas will be required to compensate, where possible, for the sacrifice in distance covered on the higher frequencies. This will also result in a lot of situations where single hops will now require multiple hops. Community Broadcasters face an increase in costs for STLs.

Sentech also proposes that the band 1479.5 – 1492 MHz be made available primarily for STL services.

Majority of Community Broadcasters are dependent on STL services as a critical medium of delivering content to distribution sites.

Footnote 5.296

Sentech is of the view that footnote 5.296 should be included in the final NRFP, especially since there have been requests for the Authority to consider the use of television white space. Footnote 5.296 is indicated below for ease of reference;

5.296 Additional allocation: in Albania, Germany, Saudi Arabia, Austria, Bahrain, Belgium, Benin, Bosnia and Herzegovina, Burkina Faso, Cameroon, Congo (Rep. of the), Cote d'Ivoire, Croatia, Denmark, Djibouti, Egypt, United Arab Emirates, Spain, Estonia, Finland, France, Gabon, Ghana, Iraq, Ireland, Iceland, Israel, Italy, Jordan, Kuwait, Latvia, The Former Yugoslav Republic of Macedonia, Libya, Liechtenstein, Lithuania, Luxembourg, Mali, Malta, Morocco, Moldova, Monaco, Niger, Norway, Oman, the Netherlands, Poland, Portugal, Qatar, the Syrian Arab Republic, Slovakia, the Czech Republic, the United Kingdom, Sudan, Sweden, Switzerland, Swaziland, Chad, Togo, Tunisia and Turkey, the band 470-790 MHz, and in Angola, Botswana, Lesotho, Malawi, Mauritius, Mozambique, Namibia, Nigeria, South Africa, Tanzania, Zambia and Zimbabwe, the band 470-698 MHz are also allocated on a secondary basis to the land mobile service, intended for applications ancillary to broadcasting.

*Stations of the land mobile service in the countries listed in this footnote shall not cause harmful interference to existing or planned stations operating in accordance with the Table in countries other than those listed in this footnote.
(WRC-12)*

Television White Space (TVWS)

In line with s34(3) and (6) of the EC Act the Authority must indicate in the NRFP which portion of the UHV band will be considered for TVWS to enable regulatory measures for the protection of existing services. Or the Authority should include a footnote indicating that future deliberation for TVWS is subject to consideration of Ministerial Policy Directive in terms of s3(4) of the EC Act.

Sentech is of the view that the band 694 – 790 MHz should not be excluded for possible TVWS usage. The only option that will make this band unfeasible for TVWS will be option A6 (Table 3) of Rec. ITU-R M.1036-4.

2.5 2500 – 2690 MHz Band

The Authority has been clear that this band will only be assigned for mobile services except aeronautical mobile. Therefore an allocation for fixed services in this band is not necessary and should be removed. Should the Authority choose to keep the allocation, the implication is that the Authority will have an administration burden of having to consider all fixed services spectrum applications.

3. CONCLUSION

3.1 Again Sentech thanks the Authority for the opportunity presented to make written comments on the Draft NRFP.