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Mr Richard Makgothlo
ICASA

By email: rmakgothlo@icasa.org.za

14 February 2013

Dear Mr Makgothlo

RE: DRAFT UPDATE OF THE NATIONAL RADIO FREQUENCY PLAN

1. On 21 December 2012 ICASA published a notice inviting comments on the draft update of the National Radio Frequency Plan ("the frequency plan"). e.tv hereby makes the following brief comments.
2. In note 3 on pages 136 and 137 of the frequency plan, ICASA states that "in addition, WRC-12 allocated the band 694 – 790 to the mobile, except aeronautical mobile services and designated it for IMT...This allocation is effective immediately after WRC-12....Replanning of the broadcasting spectrum to accommodate digital television within the band 470-694 MHz is underway. Following migration, the band 694 – 862 MHz will be used exclusively for IMT".
3. e.tv respectfully points out that there are a number of factual errors in note 3 regarding the interpretation of Resolution 232. In fact, Resolution 232 provided for the following:
 - a. To allocate the frequency band 694-790 MHz in Region 1 to mobile services on a co-primary basis with other services to which this band is allocated on a primary basis;
 - b. That the allocation will be effective after WRC-15; and
 - c. That WRC-15 will specify the technical and regulatory conditions applicable to the mobile service allocation, taking into account the ITU-R studies.
4. In effect, Resolution 232 outlines activities that ought to be carried out before the migration, and merely paves the way for the sharing arrangement between broadcasters

and mobile broadband on a co-primary basis. According to the Resolution, allocations can only be effected after the WRC15.

5. Given this, e.tv submits that note 3 must be revised accordingly to reflect that:
 - a. 694 – 790 has not been allocated to IMT exclusively; and
 - b. Any allocation to IMT is only effective after WRC-15 and it is therefore doubtful that assignments for mobile services can take place before the end of the dual illumination period; and

Yours sincerely

A handwritten signature in black ink, appearing to be 'Lara Kantor', written in a cursive style.

LARA KANTOR

GROUP EXECUTIVE: REGULATORY STRATEGY