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RE: ICASA CALLS FOR COMMENTS ON THE DRAFT IMT ROADMAP FOR BROADBAND

Altron TMT appreciates the opportunity presented by the Independent Communications Authority of South Africa (ICASA) to contribute to the Draft IMT for Broadband.

Altron TMT comprises of Altech and Bytes whose business spans across the Telecommunications, Multimedia and IT (TMR) sectors. Altron TMT is the largest privately owned converged solution provider in Africa and driven by a strong focus on providing customers with value-added products, specialised services, support and solutions through the convergence of TMT.

Altron TMT is highly supportive of the role ICASA plays in South Africa and will at all times, support its important role in the ICT sector.

To this end, two of our subsidiaries (Altech Netstar and Altech Matomo have submitted the following:

Comments on ICASA planning document:

This plan will affect Netstar in three ways:



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1. 450 to 470 MHz reallocation. The document details the outcome of the feasibility study of reallocating the 450 MHz to 470 MHz band to IMT (International Mobile Telecoms) designated as IMT450. It makes a recommendation to effect a migration of all current users of this band over a 5 to 9 year period and relicense as an IMT band. Most affected are SAPS and Transnet but this is the band that Netstar currently uses for the pager links.
2. 880 to 915 MHz consolidation. The plan also recommends the shuffling of IMT 900 (880 to 915, fully allocated to Cell C, MTN and Vodacom). Whilst this should not directly affect the Netstar network at 915 MHz, some of the recommendations include the removal of the 915 MHz (200kHz) guard band, thereby potentially increasing interference from mobile telephony into the Netstar frequencies.
3. The IMT 450 is targeted as a rural coverage network (due to good propagation characteristics) and anticipates the inclusion of specific bands for smart meter applications.

More detail on the impact:

If ICASA utilizes the 450 – 470 MHz Band for IMT deployment, then, this will greatly impact our paging network. 10 out of 13 Altech Netstar licensed paging link frequencies are within this band. Currently, these 10 frequencies are in use in entire country except parts of KZN, E Cape and S Cape where the remaining 3 frequencies are in use.

If Netstar have to move to another Band, countrywide high sites will have to be touched for equipment change – the cost is unjustifiable for the resource and equipment required to do so.

Public Safety Voice (Altech Radio Holdings)

1. Strongly agree that Public Safety users be migrated to a consolidated frequency band
2. Currently implemented in Gauteng where SAPS, EMS, Metro PD all use the same network infrastructure for mission critical communication
3. Model should be implemented nationally



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4. Altech Radio Holdings supports proposed Scenario 2 as described in 8.3.5.3 : Allocation of the 450-470 MHz band exclusively to IMT and further encourages Public Safety users to adopt a common standard and common platform;

Public Safety LTE

5. Increasing demands of Public Safety officials require dedicated wireless broadband services
6. International jurisdictions (USA, UK, Europe) already making allocations in 700MHz for dedicated public safety LTE
7. Similar approach should be followed in South Africa

I consider the above as our contribution to the Independent Communications Authority of South Africa in light of ICASA's calls for comments on the Draft International Mobile Telephony (IMT) Roadmap that seeks to ensure universal availability of broadband services as well as a vibrant and competitive telecommunications industry and promote investments.

For further information please do not hesitate to contact me on jmakhafola@altech.co.za or call 011 715 9026

Best Regards

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Joe Makhafola
Government Relations Executive
Altron TMT