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Date: 11 October 2018

Independent Communications Authority of South Africa
By e-mail: rmakgotlho@icasa.org.za

Attention: Mr Manyapelo Richard Makgotlho

Dear Sirs

ADDITIONAL COMMENT FROM THE CITY OF CAPE TOWN ON THE “INVITATION FOR COMMENTS ON THE DRAFT RADIO FREQUENCY MIGRATION PLAN 2018”

Draft Radio Frequency Migration Plan 2018

The City of Cape Town Telecommunications Branch has already provided initial comment in respect of the draft Radio Frequency Migration plan 2018.

The City of Cape Town Telecommunications Branch wishes to add to its prior comments, by raising the importance of clauses in Electronic Communications Act of 2005, as relevant to the draft migration plan.

Clause 34 (2) of the ECA states: “The Minister must approve the national radio frequency plan developed by the Authority, which must set out the specific frequency bands designated for use by particular types of services, ***taking into account the radio frequency spectrum bands allocated to the security services***” (*our added emphasis*).

Further Clause 34 (7) of the ECA states: “In preparing the national radio frequency plan as contemplated in subsection (4), the Authority must-

(c) consult with the Minister to—

- (i) incorporate the radio frequency spectrum allocated by the Minister for the exclusive use of the security services into the national radio frequency plan;
- (ii) take account of the government’s current and planned uses of the radio frequency spectrum, including but not limited to, civil aviation, aeronautical services and scientific research

The City is of the view that the draft Radio Frequency Migration plan directly affects the existing allocation of spectrum in **410-430 MHz range (section 4.10.11)**, where ICASA plans to migrate existing government and mobile data users out, and to reserve the band for "Public Digital Trunking". The City is concerned that ICASA intends to designate the sub 400 MHz bands for narrowband (voice) PPDR usage. The City currently has spectrum in the 420MHz range that is used for Safety and Security purposes. The City is thus of the view that the Authority must be required to consult with the Minister specifically in regard to spectrum allocated to "governments current use" and "spectrum allocated for the exclusive use of the security services."

Yours sincerely

A handwritten signature in black ink, appearing to read 'Thomas A Bosman', written over a horizontal line.

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