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This response is from
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Written Input for the Draft IMT Roadmap

This response is from the Wireless Access Providers Association (WAPA), the South African industry body representing about 200 fixed wireless Internet service providers.

- WAPA believes that the EC Act of 2006 has given South Africa a dramatic improvement in the provision of Internet access across the country.
- Key to this is the ability for small business to gain a license in district areas and provide directly Internet services to the end users. This has not only provided coverage from alternative providers but through market forces and competition brought down the cost of data.
- Critical for reducing cost is that spectrum allocation of ISM bands is maximised and that these bands line up with other countries so that lower cost, mass produced radios can be effectively deployed in South Africa.

To this end WAPA requests that ICASA protects and expands the ISM licensing in the following areas:

Frequency	Common name	License type	Comments
470 -694 MHz Excluding 606-614 MHz	TV White space	Light	Allocation by dynamic spectrum database.
2.4 GHz	Home Wi-Fi	ISM License exempt	
3.5 GHz		Light	Allocation by dynamic spectrum database. Not to be issued to mobile network operators
5 GHz	Outdoor Wi-Fi	ISM Licensed exempt	Request increasing the available channels

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17.6 to 17.8 GHz		ISM Licensed exempt	Point to point registration
24 GHz	Air Fibre	Light	Point to point registration
60 GHz	mm wave V-band	Licensed exempt	Not to be issued to mobile network operators
80 GHz	mm wave E-band	Light	Not to be issued to mobile network operators

We also request that issuing of further licensed spectrum mentioned in the document to any of the large incumbent network operators comes with the proviso that they will not be permitted to operate in areas of light licensing. This then reserves this spectrum for growing small enterprises with a priority given to those that are majority black owned. We support conceptually link registration databases on all new Point to Point spectrum allocation.

We also request at the appropriate time access to additional TVWS channels which become available after the terrestrial digital TV migration.

Yours Sincerely

Tim Genders
WAPA Chair