

**The Independent Communications Authority of South Africa**

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Motorola Solutions, Inc. ("MSI") hereby submits these comments in response to **ICASA's Information Memorandum - IMT Gazette No.42820 01-11-2019.**

MSI would like to congratulate ICASA on progress achieved to date towards making more high demand mobile IMT spectrum available for the provision of electronic communication services in South Africa; and for the proposal to enable a new mobile broadband Wireless Open Access Network (WOAN) provider, in line with the policy set by the Department.

We understand that the focus of the ICASA Information Memorandum is to enable existing mobile service providers to secure IMT spectrum, and to implement the new policy on WOAN and high demand spectrum. However, we would like to bring to ICASA's attention a potential conflict for the 700 MHz band between the proposed options for IMT spectrum award lots for commercial carriers (industry, incumbent & WOAN), and a potential decision on Broadband Public Protection and Disaster Relief (for emergency services, safety and security applications).

In the White Paper on South Africa's National Integrated ICT Policy, Goal 9.2.3 is to: *"Support the provision of, emergency services, safety and security and sector-specific operations to all South Africans."* Rapid deployment in emergency situations, as well as the provision of emergency services under non-emergency conditions, require assured spectrum resources and usage rules. This includes having access to defined spectrum in harmonized bands suitable for broadband applications, as well as defined spectrum for narrowband PPDR networks that are based on approved industry standards.

South Africa's National Radio Frequency Plan No. 41650 of May 2018 includes the following comment on frequency band 694-790 MHz (pages 103-104): *"Consideration of the future spectrum needs of Broadband Public Protection and Disaster Relief (PPDR) in the range 694-790 MHz as described in the most recent ITU-R M.2015, while taking into account studies called for by Resolution 646 (WRC15) for technical and operational measures."*

In CRASA's "Framework for Harmonisation of Radio Frequencies for Public Protection and Disaster Relief (PPDR)", updated in April 2019, members agreed to recommend that part of the frequency paired arrangement of 700MHz within the 2x33 MHz be harmonized for Broadband PPDR, based on ETSI LTE standard and in accordance with ITU R Resolution 646 (WRC-2015) and Recommendation ITU-R M. 2015. CRASA has further recommended that its members amend their national frequency plans to incorporate PPDR spectrum decisions, strengthen the regional policy harmonisation

process, and create a conducive environment for effective coordination and operation of telecommunications and ICT in disaster situations.

We kindly ask ICASA to consider the following points before finalizing a spectrum award plan:

- Prioritize a spectrum decision for Broadband PPDR in parts of the 694-791 MHz band, to meet the needs of South Africa’s public safety needs.
- Favor *Option 4* for spectrum award, with a proposed modification as below:

Reserved 10 MHz *BB PPDR	Option 4 Lot A 20 MHz	Reserved 10 MHz *BB PPDR	Option 4 Lot A 20 MHz
703                      713                      733		758                      768                      788	

A proposed revision to Option 4 700MHz band Lot A for WOAN and Reserved block 10 MHz:

In summary, MSI supports Option 4 in the Memorandum, with a minor variation. We also believe it is timely now to decide on the “Possible Future Assignment” block, and reserve it for needs of Broadband PPDR to be considered within the range 694-791MHz. Reserving spectrum for advanced broadband PPDR would enable South Africa’s security and public safety agencies to benefit from developments in technology, and to use broadband in the future in a band that is suitable and offers enough bandwidth for delivery of future broadband PPDR applications.

MSI is available to provide any further clarification needed.

Kind regards

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