



SOUTH AFRICAN INSTITUTE OF ELECTRICAL ENGINEERS

Dear Sir,

We welcome the opportunity to comment on the **Notice on the Licensing Process for IMT Spectrum**, as published in GG 42820 on 2019-11-01.

About the SAIEE

The South African Institute of Engineers (SAIEE) is a Learned Society which is recognised by the Engineering Council of South Africa (ECSA) as a Professional Association. Over a century old, the SAIEE has some 6,000 Electrical and Electronic Engineers of various disciplines, including telecommunications, as members. As such, it represents the foremost repository of skills in these fields in South Africa.

Introduction

No High Demand Spectrum (except for 5 MHz assigned to MTN) has been made available to the industry for well over a decade. There are over 400 iECNS licensees who are unable to effectively operate as a result. Since this spectrum is “High Demand”, there is by definition insufficient spectrum available to satisfy all potential needs, if a conventional assignment approach is taken. As an attempt to alleviate this situation, the Policy maker proposed a Wholesale Open Access Network (WOAN). This does indeed offer a potential solution to increasing services-based competition, and thereby allow new entrants into the market. Increased competition has the effect of reducing prices and increasing creativity.

We welcome the publication of this notice, coming as it does after the publication by the Minister of DTPS in July 2019. We are pleased to see that it looks like the Regulator and the Policy Maker may at last be finding some common ground.

However, we believe that neither the Minister’s nor the Authority’s proposals go far enough in satisfying the needs of all major stakeholders. These are, briefly:

- The existing incumbent MNOs,
- Larger licensed entities wishing to join the incumbents,
- Larger licensed entities wishing to supply infrastructure-based services nationally,
- Smaller licensed entities wishing to supply infrastructure-based services regionally,
- Licensees of various sizes wishing to provide service-based services (via the WOAN),

- The current and future customers of the above, many of whom suffer for poor connectivity at high prices, and
- Government's need both to meet the Connect SA targets and to grow the economy.

Brief Comments

The Authority proposes some 5 packages, or Lots, to be made available by auction or otherwise. We believe that this does not go nearly far enough. There is sufficient IMT spectrum available for assignment to allow up to 11 national packages, plus an additional 50 regional packages.

Secondly, not all available IMT spectrum has been considered, such as the "guard bands" in the 700 and 800 MHz bands. It should be noted that the likelihood of ever implementing all 7 National Muxes for DTT on a national basis is vanishingly small, as the business case simply does not exist for broadcasting.

Thirdly, we believe that it would be a mistake if the Authority were to restrict itself to traditional static exclusive assignment of spectrum in these IMT bands.

We do agree that all this IMT spectrum must be made available on an open access basis, and that this should be a condition of award.

Presentation

Attached are slides that were presented at the first SAIEE National Conference in November 2019. These will hopefully shed some light on our suggestions to maximise the benefit of the available IMT spectrum to all the citizens of South Africa.

Oral Hearings

In the event that oral hearings are held, the SAIEE would welcome the opportunity to clarify and enlarge on these suggestions.

We remain available to assist the Authority at any time and in any manner within our capability.

Kind regards



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SAIEE Council member