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**DRAFT RADIO FREQUENCY SPECTRUM  
ASSIGNMENT PLAN FOR THE FREQUENCY  
BAND 450 MHz – 470 MHz FOR PUBLIC  
CONSULTATION**

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**COMMENTS BY ESKOM**

**DATE**

**20 May 2022**

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**COMMENTS BY ESKOM ON THE**

**DRAFT RADIO FREQUENCY SPECTRUM ASSIGNMENT**

**PLAN FOR THE FREQUENCY BAND 450 MHz – 470 MHz**

**FOR PUBLIC CONSULTATION**

**PUBLISHED FOR GENERAL COMMENT IN THE GOVERNMENT**

**GAZETTE No. 46160 – NOTICE [ ] OF 2022**

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**1 INTRODUCTION**

Eskom supports the Independent Communications Authority of South Africa (ICASA)'s radio frequency spectrum migration plans for IMT and other Radiocommunications frequency bands to ensure that sufficient radio frequency spectrum is available for broadband and other services. Eskom is grateful for the opportunity to participate in making submissions on the latest draft.

**2 GENERAL COMMENTS**

Eskom is a holder of a Private Electronic Communications Network (PECN) licence exemption issued by ICASA according to the Electronic Communications Act (ECA) Act Section 6(2)(c). Eskom's national telecommunications network is primarily & principally used to enable operation and maintenance services for national power generation, transmission and distribution. These services include the power network's Supervisory Control and Data Acquisition (SCADA) for telecontrol; teleprotection; telemetering; measurements and other support services.

Eskom is affected by these migration plans as it currently uses 450 – 453 MHz paired with 460 – 463 MHz for fixed UHF Links services.

Eskom has largely migrated to an alternative band (1.4 GHz) but there are still isolated cases of long obstructed links that will not be viable at 1.4GHz.

In addition, the use of 1.4GHz is prohibited in the declared Karoo Central Astronomy Advantage Areas (KCAAA) according to the revised Exempted Radio Frequency Spectrum for the KCAAA, (Government Gazette (GG) 45045) read with the Regulations on the Protection of the KCAAA (GG 41321), with respect to the Astronomy Geographic Advantage Act of 2007 (the “AGA Act”). The radio frequency bands 450 - 453MHz and 460 - 463 MHz are, however, exempt in this area. Eskom UHF links in the KCAAA area can therefore only use these bands (450 – 453 MHz, 460 – 463 MHz) according to the table of exempted frequencies.

### 3 SPECIFIC COMMENTS

Appendix A: Table 3 of these draft plans refers.

With regards to 450 - 455 MHz, Eskom would like to be included alongside Government Services under the “Typical Applications” field.

<b>South African Allocation and footnotes</b>	<b>Typical Application (Proposed by Eskom)</b>	<b>Notes and comments</b>	<b>Motivation for Exemption</b>
450 – 455 MHz  FIXED  Site A Tx	Fixed Links (450 – 453 MHz)  Government Services, Eskom	Paired with:  460 – 463 MHz  <b>Site B Tx</b>  <b>25KHz Channel Spacing</b>	a) Distance between some isolated UHF link sites make it unviable to operate on the other alternative frequency band (1.4MHz).  b) 450 – 470 MHz band is exempt from prohibitions & restrictions in the KCAAA area, so it can be used in the KCAAA. 1.4 GHz is strictly prohibited in the KCAAA.

## **4 CONCLUSION**

As an essential enabler of socio-economic development in the country, including enabling the operation of new services for which the IMT migration is sought, and as a government owned entity, Eskom would like to be considered alongside Government Services when ICASA develops exclusive zones to protect these services during the RFSAP development, as contemplated in the feasibility study Findings of the Inquiry on radio frequency migration plans and the IMT Roadmap (GG45690).

Eskom commends the extensive work done in finalising these Plans by all concerned and would like to extend its appreciation to ICASA for the opportunity to submit this representation. Eskom will not be seeking an opportunity to make oral representations at this stage. Should further clarification or information be required, Eskom would be more than happy to provide same.