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The Independent Communications Authority of South Africa (ICASA)

350 Witch-Hazel Avenue, Eco Point Office Park
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Attention:

Mr Manyapelo Richard Makgotlho
Email: rmakgotlho@icasa.org.za

13 January 2023

Re: Response to ICASA's Draft Radio Frequency Spectrum Assignment Plans

Dear Mr Makgotlho,

Huawei would like to thank ICASA for the opportunity provided to the company to comment on the Draft Radio Frequency Spectrum Assignment Plans, published in the Government Gazette No. 47559 dated 25/11/2022.

Huawei is the leading supplier of infrastructure equipment for the telecommunications industry globally and in South Africa, as well as being a major manufacturer of mobile handsets and other electronic consumer goods.

Huawei welcomes the opportunity to submit the following comments for your consideration and requests the opportunity to make an oral presentation. Please feel free to contact us if you have any question or require any further clarification.

Yours sincerely,



Musa Ngobeni

13 January 2023

Date

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Comments from Huawei on ICASA's Draft Radio Frequency Spectrum Assignment Plans

Huawei fully supports ICASA efforts in the regulatory process of developing these Draft Radio Frequency Spectrum Assignment Plans, which they will form part of the draft RFSAPs of Specific Radiocommunications Systems aim to update and improve the usage of non-IMT radio frequency spectrum in certain priority bands, in terms of section 34(16) of the Electronic Communications Act No 36 of 2005.

We provide comments on selected spectrum topics herewith.

Spectrum for Public Protection and Disaster Relief (PPDR)

The need for the mission-critical communication of PPDR is supplied by special communications systems where the reliability, availability, stability, and security of mobile communication are vital to ensure the continuous availability of functions critical for society.

Traditionally, emergency services used spectrum in 380-450 MHz for voice and limited narrowband data communications. With the increasing demands for new services which includes but not limited to mobile video reporting from field locations, body worn cameras and drone cameras as well as geographic location maps etc, broadband PPDR service is a must and adopting LTE and 5G technology is the new trend. Hence in addition to these spectrum bands that are currently being consulted, a new band for broadband PPDR would still be required.

Latest trend on transportation industry spectrum

Global industry digitalization is accelerating, among them global transportation industry is experienced major digital transformation. Railways deploy railway train and trackside systems to address the ever-evolving challenges and requirements for train operations. These include train positioning information, surveillance and trackside applications to improve railway traffic control, as well as safety and security operations.

Since GSM-R has become obsolete and is no longer the future of rail data transmission, the new 5G-enabled telecommunications standard Future Railway Mobile Communication System (FRMCS) is anticipated to improve safety, the passenger experience and operational efficiency. To achieve these benefits, new spectrum bands are also required.

In Europe, ECC Decision (20)02¹ has addresses the designation of the paired frequency bands 874.4-880.0 MHz and 919.4-925.0 MHz and of the unpaired frequency band 1900-1910 MHz to be used for Railway Mobile Radio (RMR), which encompasses GSM-R and its successor(s), including the Future Railway Mobile Communication System (FRMCS).

In South Africa, as the Next Generation Radio Frequency Spectrum Policy for Economic Development in consultation has specified the sunset roadmap of 2G networks, the Authority may start the consultation on new spectrum need for the transportation industry as well.

¹ <https://docdb.cept.org/document/16736>