NATIONAL ASSOCIATION OF BROADCASTERS

RESPONSE TO FINAL DRAFT RADIO FREQUENCY BAND PLAN

8 February 2001

(1) GENERAL

The National Association of Broadcasters (NAB) hereby submits its comments in response to Notice 4568 of 2000 as published in Government Gazette No. 21833 on 7 December 2000.

We note that in many areas, the Final Draft Plan appears to duplicate the Telkom submission on SABRE of February 2000. We trust that the fundamental principle of separation of regulatory functions from telecommunications operations is not being prejudiced.

Notwithstanding the above, we are pleased to note that many of the NAB's previous concerns have been addressed in this document. We have therefore confined our comments to areas and frequency bands in which some concerns still exist. We list these hereunder.

We do not require the opportunity to make an oral submission on this matter.

(2) 2.5 – 2.7GHz MMDS

Section 2 of the Draft Radio Frequency Band Plan published in Notice 2488 of 16 November 1999, referred to Government Gazette notices that were to be consolidated into the final band plan. One of the gazettes referred to, is Gazette No 18882 of 30 April 1998 that deals with MMDS. MMDS is a matter arising from SABRE-1 that was not fully addressed at the time. The Final Draft Radio Frequency Band Plan makes no reference to this band. This matter should be resolved as a matter of urgency.

Numerous operators are licensed to operate in this band for MMDS Television, educational and information dissemination, and point to point OB links. It is also used extensively in Europe, USA, South America and Central Africa for conventional AM analogue television transmissions for local area needs. The prime use of this band by MMDS would be for schools and universities and in general, the trend of migration from analogue to digital will allow significant economy of bandwidth, allowing a small number of MMDS channels either side of the TDMA rural telephony allocation.

As it is apparent that TDMA will not fully utilise this entire frequency spectrum, there also needs to be some sharing of the TDMA on a secondary basis with manpack type ENG microwave links for short haul operation in stadiums and even indoor events. The technical department of SATRA previously indicated the possibility of shared allocation of this band and a suitable interpretation of that plan is attached. This plan will allow for 6 x 8MHz wide digital MMDS channels as well as 5 x ENG manpack microwave channels used on a secondary basis to the TDMA systems. We believe that this will be an admirable compromise between rural telephony usage and broadcasters' requirements.

(3) 3.4 – 3.6GHz

In the Government Gazette No. 17983 of 6 May 1997, the use by broadcasters of the 3.4 – 3.6GHz band for outside broadcast rapid deployable links was discontinued in favour of fixed radio access telephony systems.

Unfortunately, the time given for migration was totally impractical as no suitable band was earmarked for broadcasters to migrate to. We are delighted that the SABRE II under N.F.4 allocates the band 4.4 – 5.0GHz for these applications and that broadcasters now have a realisable goal for migration. Unfortunately, however, a large amount of equipment is still in use in the 3.4 – 3.6 GHz band. Whilst the life span of the equipment would be a reasonable target for migration, an alternative target for migration could be 31/12/2005 which is commensurate with the migration of the other frequency bands occupied by Telkom.

The NAB recommends that as a matter of urgency, the licences that are currently being operated and paid for by M-NET and SABC in these bands, should be revoked in favour of licences to operate in the 4.4 – 5.0GHz band. It should be clearly stated that migration must take place prior to the 31/12/2005.

(4) 11.7 – 12.5GHz

Reference to BSS plan WRC 2000 (App S30) is absent and should be included under Notes and Comments. BSS should also be listed under Main Service and Application.

(5) 13.75 – 14GHz

FSS feeder links should be included under Application.

(6) 14 - 14.25GHz/14.25 - 14.3GHz/13.3 - 14.4 GHz/14.4 - 14.47 GHz/14.47 - 14.5GHz

Under Application, VSAT/SNG/FSS feeder links should be inserted and BSS feeder links should be deleted.

(7)14.5 - 14.8GHz

It should be noted that the use of this band by FSS (Earth-to-space) is limited to feeder links for the broadcasting-satellite service. BSS feeder links must be included in under Application (See S5.510).

It should be noted that South Africa has been allocated 10 channels in the ITU provisions and associated Plan for feeder -links for the broadcasting- satellite service (14.5 - 14.8 GHz) - See appendix S30A (WRC 2000).

The 5 channels in the 17.3 - 17.7 GHz band allocated to South Africa in the Ge 77 Plan have been deleted and replaced by the channels in the 14.5 - 14.8GHz band.
The Application column (14.5-14.8 GHz) must therefore read PTP links/ENG OB/BSS feeder links.

The national Footnote NF13 should also include:

"The Low and medium capacity access networks under FS using the band 14.5 - 15.35 GHz must be fully compatible with the BSS feeder links operating in accordance with the ITU Frequency Plan (ApS 30A)".

"The reserved channels and frequency sub-bands (Reserved 14500 - 14627 and Reserved 14648 - 14800) allocated for urgent or immediate needs in the band 14.5 -

14.8 GHz must be fully compatible with the BSS feeder links operating in this band in accordance with AP S30A".

(8) 17. 3 – 17.7GHz / 18.1GHz

Reference to BSS feeder links (future) should be deleted.

(9) 40.5 – 42.5GHz

Reference to WRC 2000 FSS allocation is absent and should be included.

(10) MIGRATION

In closing, the NAB wishes to raise a concern around migration, relating to the apparent lack of co-ordination between ICASA's licensing and planning departments. This has been demonstrated by the fact that licences continue to be issued in bands where migration has already taken place.

The NAB recommends that the migration plan allow for the automatic transfer of licences from the original band to the new band.

We thank you for the opportunity to make our comments.