

Government Gazette

GENERAL NOTICE

NOTICE 730 OF 2014

INDEPENDENT COMMUNICATIONS AUTHORITY OF SOUTH AFRICA



PURSUANT TO SECTION 4 (1) OF THE ELECTRONIC COMMUNICATIONS ACT
2005, (ACT NO. 36 OF 2005)

**HEREBY ISSUES A NOTICE REGARDING THE DRAFT IMT ROAD MAP FOR
CONSULTATION – INVITATION FOR COMMENT DOCUMENT.**

1. The Independent Communications Authority of South Africa ("the Authority"), hereby publishes **the Invitation for Comments document on the Draft IMT (International Mobile Telecommunication) Roadmap for Consultation** in terms of section 2 and 4, read with sections 30, 31(4), and 33 of the Electronic Communications Act (Act No. 36 of 2005).
2. Interested persons are hereby invited to submit a hard copy as well as an electronic version of their representation on the Draft IMT Roadmap by no later than 16h00 on Tuesday, 7 October 2014.
3. When compiling their representation in terms of (2) above, respondents are required to respond to the questions using the attached template which can be obtained on the ICASA website: www.icasa.org.za.

4. Written representations or enquiries may be directed to:

The Independent Communications Authority of South Africa

Pinmill Farm Block A

164 Katherine Street

South Africa

Private Bag XI0002

Sandton

2146

Attention:

Mr Manyapelo Richard Makgotlho

e-mail: rmakgotlho@icasa.org.za

5. All written representations submitted to the Authority pursuant to this notice shall be made available for inspection by interested persons from 8th of October 2014 at the ICASA Library or website and copies of such representations and documents will be obtainable on payment of a fee.

Where persons making representations require that their representation or part thereof be treated as confidential, then an application in terms of section 4D of the ICASA Act, 2000 (Act No. 13 of 2000) must be lodged with the Authority. Such an application must be submitted simultaneously with the representation on the draft IMT roadmap. Respondents are requested to ensure that any confidential material is marked clearly as confidential or placed in an annexure which is titled confidential. Kindly note that should the request for confidentiality be refused, the person making the request will be allowed to withdraw the representation or document in question.

Dr SS MNCUBE
CHAIRPERSON



Invitation to Comment
on the
Draft IMT Roadmap

August 2014

1 Cover Sheet

Title

Mr

Given Name(s)

Leon

Surname

Van Wyk

Representing (self /organisation)

Organisation

Name of organisation (if applicable)

City of Cape Town

Contact telephone number

0214009050

Contact email address

leon.vanwyk@capetown.gov.za

1.1 Confidentiality

See page 2 above.

1.2 Declaration

I confirm that the information supplied on the cover sheet may be incorporated into a formal consultation response: it can be published by ICASA, unless otherwise specified on this cover sheet, and I authorise ICASA to make use of the information in this response to meet its legal requirements.

Signed at *Cape Town*

Date *06 OCTOBER 2014*

2 Invitation to Comment

The Authority invites written comment from relevant stakeholders on the draft IMT Roadmap and Feasibility studies for IMT in 450-470 MHz and 880-960 MHz.

2.1 IMT450

2.1.1 The Authority invites industry views on IMT usage in general in 450-470MHz.

The City of Cape Town has a license for spectrum in the 410-423MHz range that is used for Private Mobile Radio based on a TETRA system. The City requires additional spectrum in this range to be used for low bandwidth Public Sector Safety and Security Data networks. Although the bandwidth capacity in this frequency is low, LTE data applications are now available for data usage in this frequency range. Public sector Safety and Security requires a private network as these systems are used for switching of traffic signals and for data modules on law enforcement and disaster management vehicles.

It is imperative that consideration should be given to making spectrum available to be shared by all tiers of government in the 450 – 470MHz band. While it is agreed that this band has a great advantage over the higher frequency for serving a greater area with fewer base stations, it has a lower bandwidth capability and the numbers of terminal that use LTE is very limited and would push up the terminal equipment cost for rural users.

10MHz unpaired TDD should be reversed in the band 450 – 470MHz band for public safety and community services.

The City is therefore of the view that NO IMT migration into this band be allowed, that existing private operators be moved to other bands and that this band be reserved for public safety and security applications

2.1.2 The Authority invites industry views on IMT paired spectrum usage for PPDR.

The City supports the need for IMT paired spectrum for PPDR as the reserved spectrum in the 380 – 423MHz band really only covers the voice communications.

2.1.3 The Authority invites industry views on IMT paired spectrum usage for the SA connect initiative.

2.1.4 The Authority invites industry views on IMT unpaired spectrum usage for M2M and smart energy/grid applications in South Africa.

The City of Cape Town is a major player in the Smart meter/Smart Grid monitoring space, with more than 2 million households within the metro area. Although such applications may be "fixed" geographically and require relatively low bandwidth, these usages are extremely time dependant and the large number of systems imply robust use of spectrum. The 450 – 470MHz TDD range is suitable here but should be linked with spectrum in the 700 – 800MHz range to facilitate lower cost terminal equipment for poorer communities and backhaul links.

2.1.5 The Authority invites industry views on the migration of incumbents (Transnet, SAA, Telkom, etc.) out of the 450-470 MHz band.

The City believes that any private sector use in this band is inappropriate and that as far as possible this band should be for public safety and security application. Telkom should be moved out of this band and private networks such as SAA and Transnet should have limited usage or be migrated out. Transnet and SAA could still be accommodated in this band if they embraced the LTE technology.

2.1.6 The Authority invites industry views on the migration time line.

The migration should happen as soon as possible and no later than 24months

2.1.7 The Authority invites industry views on destination bands.

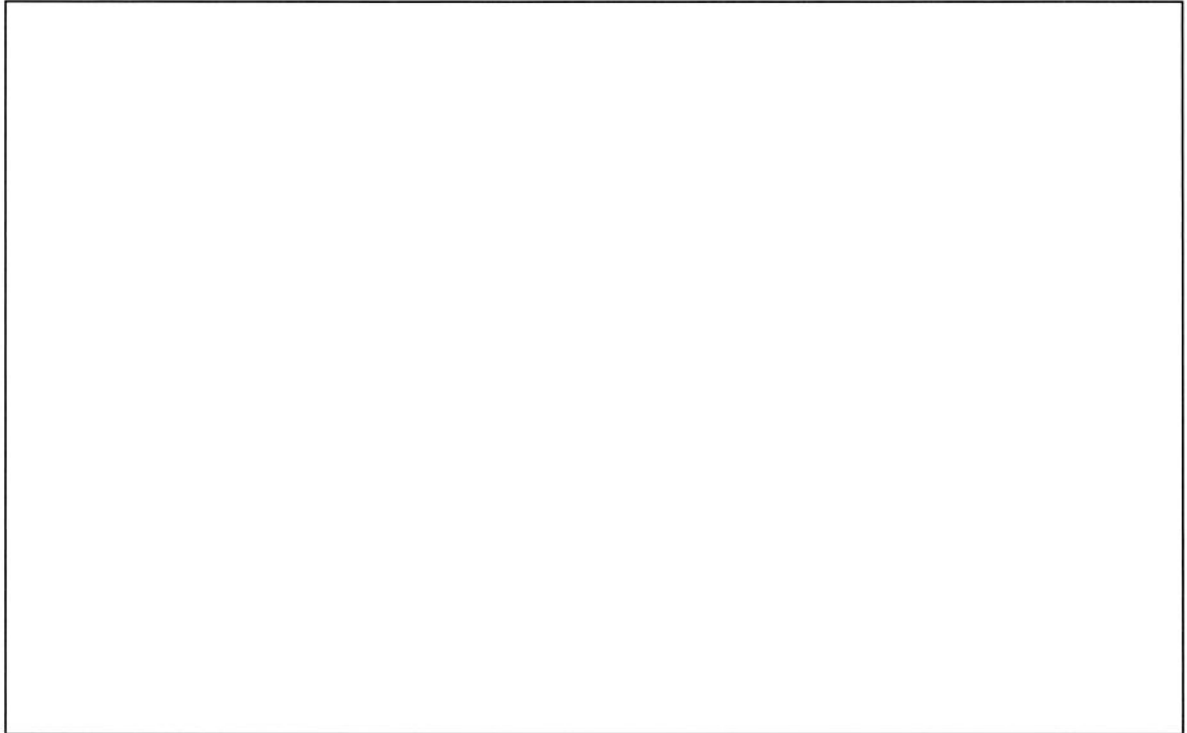
Telkom does not need to be allocated any additional spectrum due to their wide band coverage in many bands. There is a concern that the spectrum reserved for TETRA voice communications in the 380 – 423MHz bands is limited and it would be even more congested if other services were migrated to this band.

2.1.8 The Authority invites industry to give any other inputs that must be taken into consideration when finalising plans for the IMT 450 band

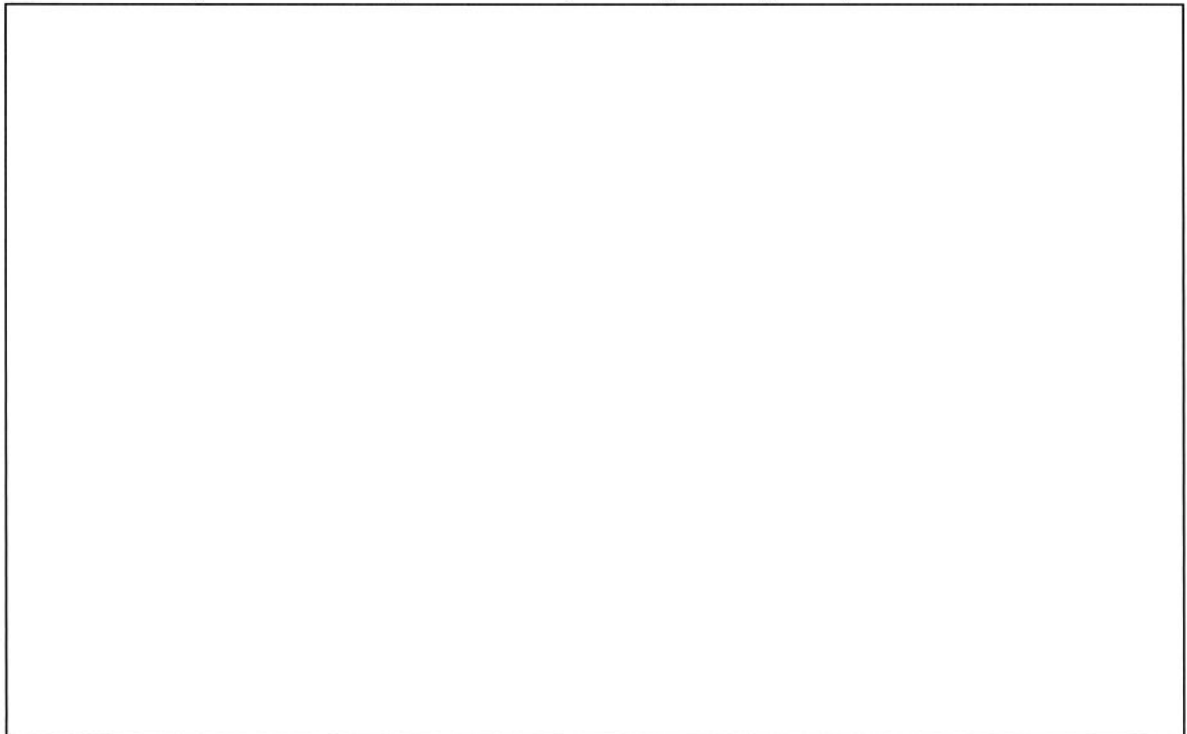
ICASA should publish clear set-asides for Spectrum to be used by the Public Sector for safety and security networks. Where the ECA is largely silent on these matters, municipalities have taken it upon themselves to participate in the licensing regime as if they were private sector operators - although they are merely doing so as no other mechanism exists for public sector service provision. ICASA should therefore reserve spectrum for such usage, which would enable licensed municipalities to provide better safety and security networks

2.2 IMT700

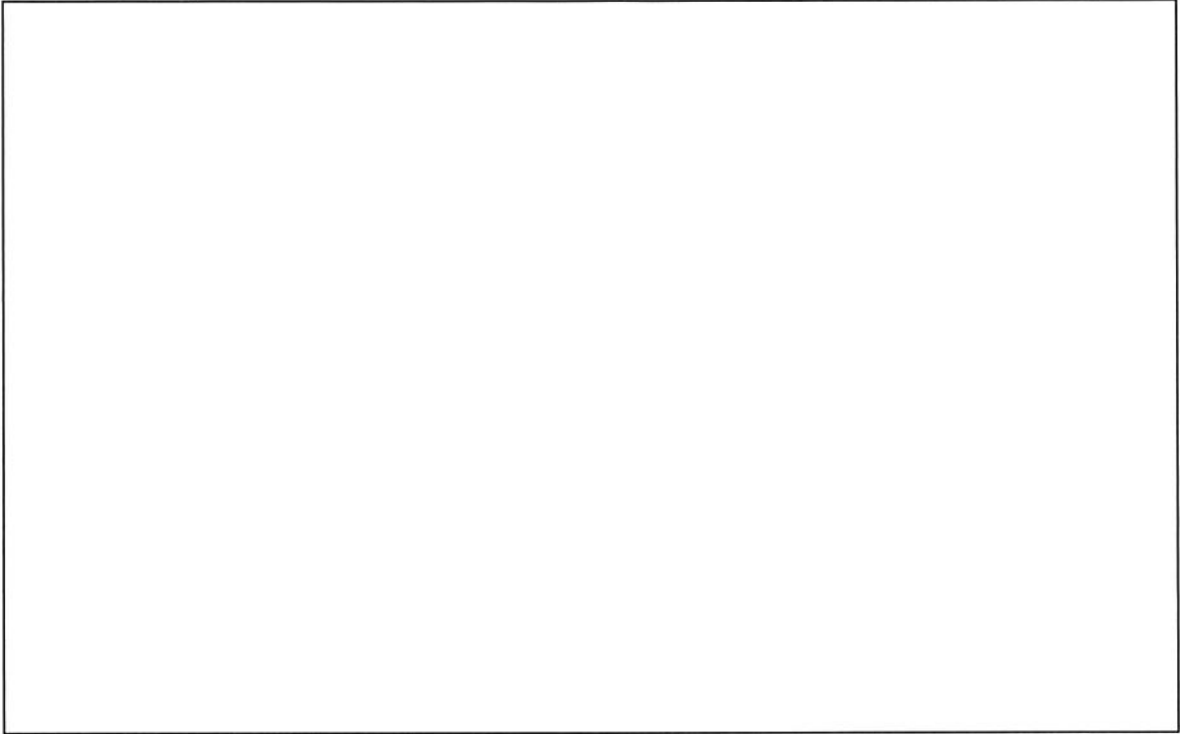
2.2.1 The Authority invites industry views on Option 1 (ITU Region 3).

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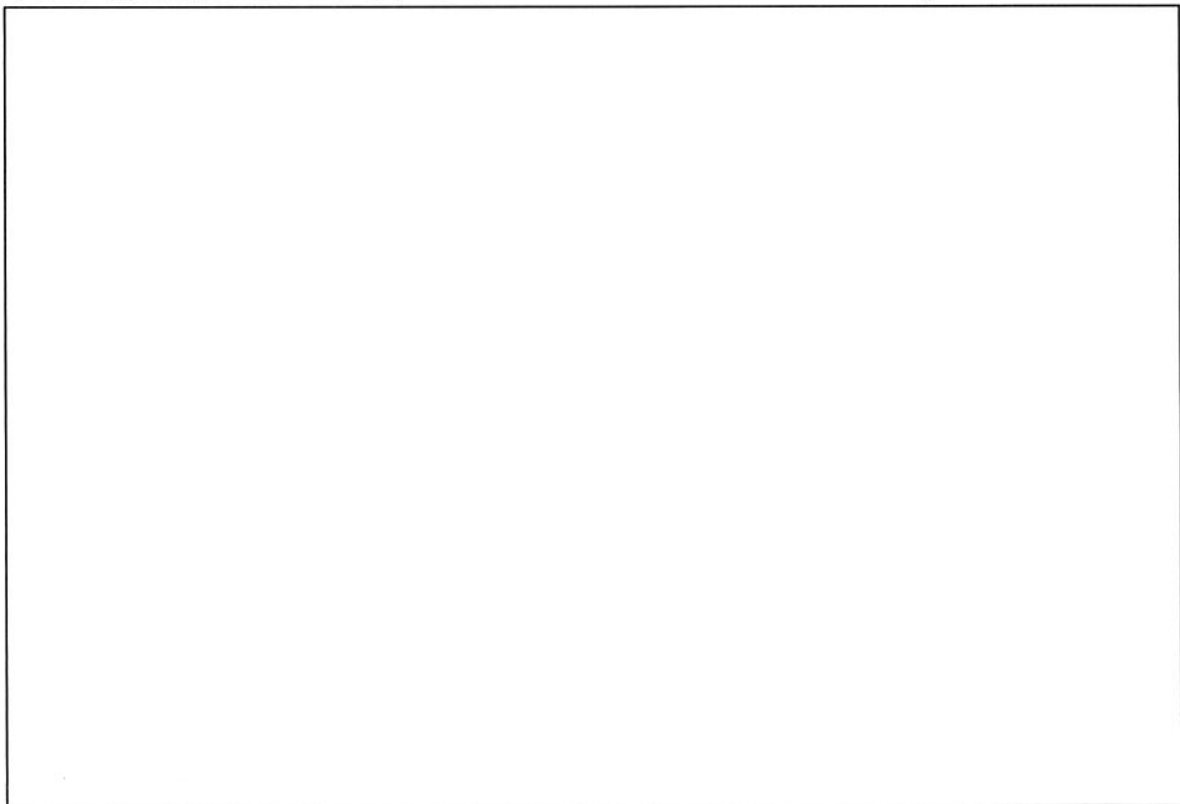
2.2.2 The Authority invites industry views on Option 2 (ITU Region 1).

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2.2.3 The Authority invites industry views on Option 3 (ITU Region 1).

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2.2.4 The Authority invites industry views on 2×3 MHz IMT band of ITU Region 1 solution.

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2.2.5 The Authority invites industry views on other ITU Region 1 based suggestions.

2.3 IMT750

2.3.1 The Authority invites industry views on IMT unpaired spectrum in the coverage band of 750 MHz.

The City requires additional spectrum in this range or alternatively the 800MHz range to be used for medium bandwidth public safety and security data networks. LTE data applications are now available for data usage in this frequency range. Public safety and security services require a private data network as these systems are used for switching of traffic signals and data applications for Traffic, Law Enforcement and Disaster Management vehicles. It is recommended that 15MHz unpaired TDD should be reserved for Public Safety and Security allocation on a regional basis in this range.

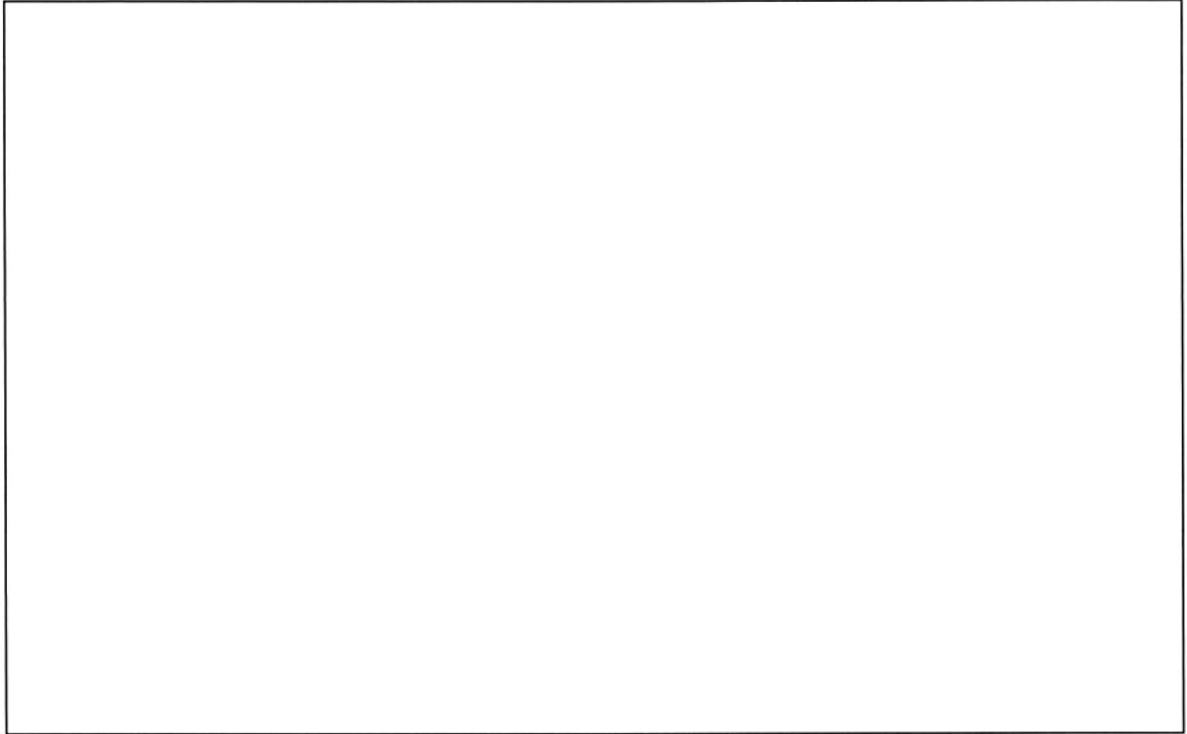
2.4 IMT800

2.4.1 The Authority invites industry views on Option 1 (ITU Region 3).

The City requires additional spectrum in this range or alternatively the 700MHz range to be used for medium bandwidth public safety and security data networks. LTE data applications are now available for data usage in this frequency range. Public safety and security services require a private data network as these systems are used for switching of traffic signals and data applications for Traffic, Law Enforcement and Disaster Management vehicles. It is recommended that 15MHz unpaired TDD should be reserved for Public Safety and Security allocation on a regional basis in this range. The City is therefore of the view that 15MHz unpaired TDD should be reserved for public safety and security allocation on a regional basis in this range

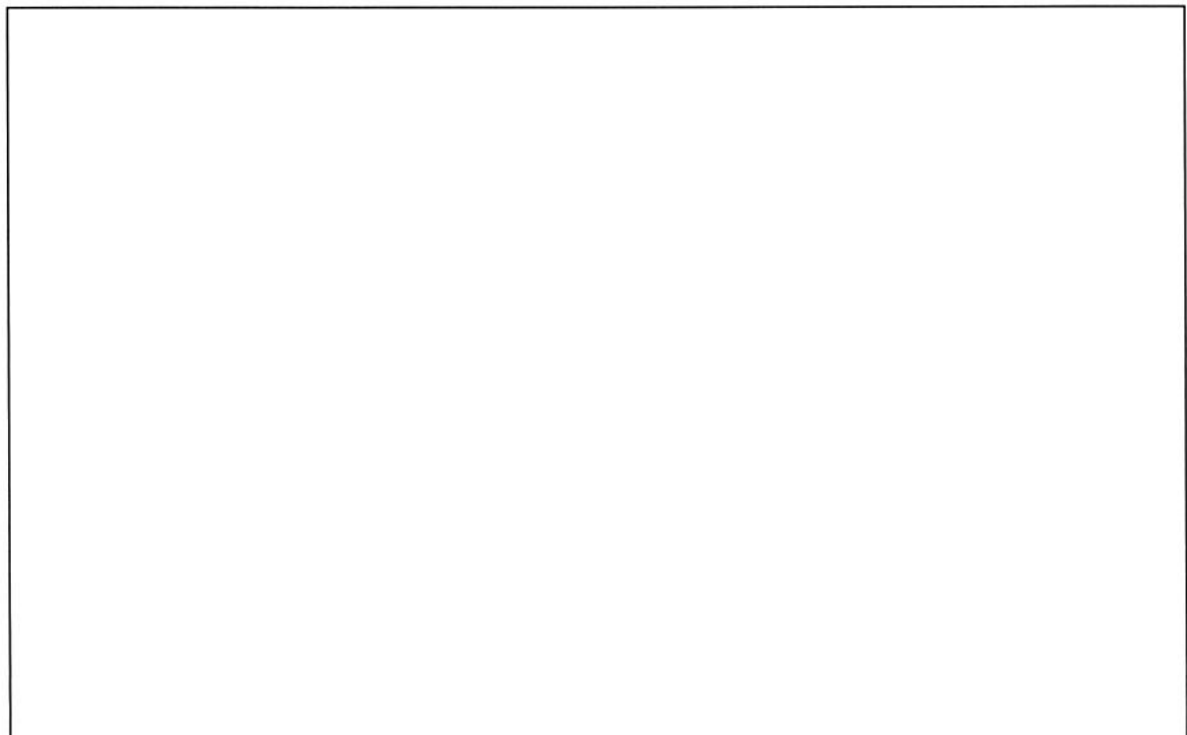
2.4.2 The Authority invites industry views on the 2x3 MHz IMT band of Option 1 (ITU Region 3).

2.4.3 The Authority invites industry views on Option 2 and 3 (ITU Region 1)

A large, empty rectangular box with a thin black border, intended for industry views on Option 2 and 3 (ITU Region 1).

2.5 IMT850

2.5.1 The Authority invites industry views on the migration of incumbents (Neotel, etc.) out of the band.

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2.6 GSM900 spectrum consolidation

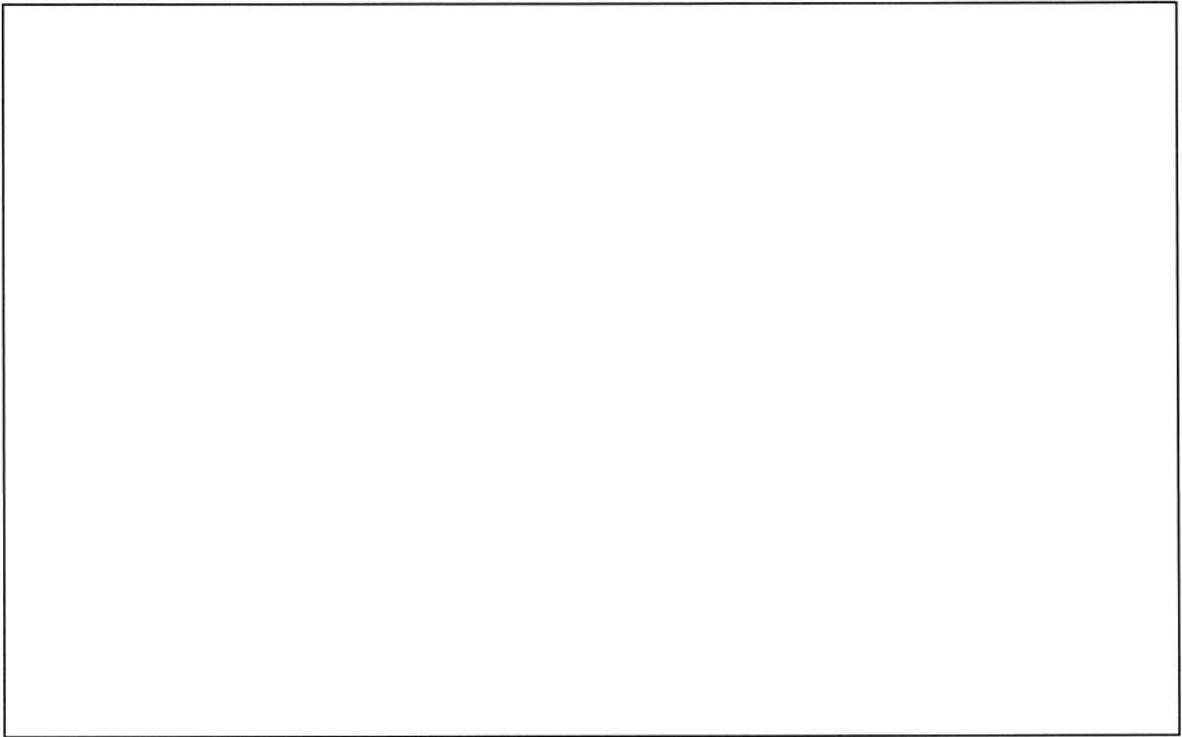
2.6.1 The Authority invites industry views on spectrum consolidation.

2.6.2 The Authority invites industry views on guard bands.

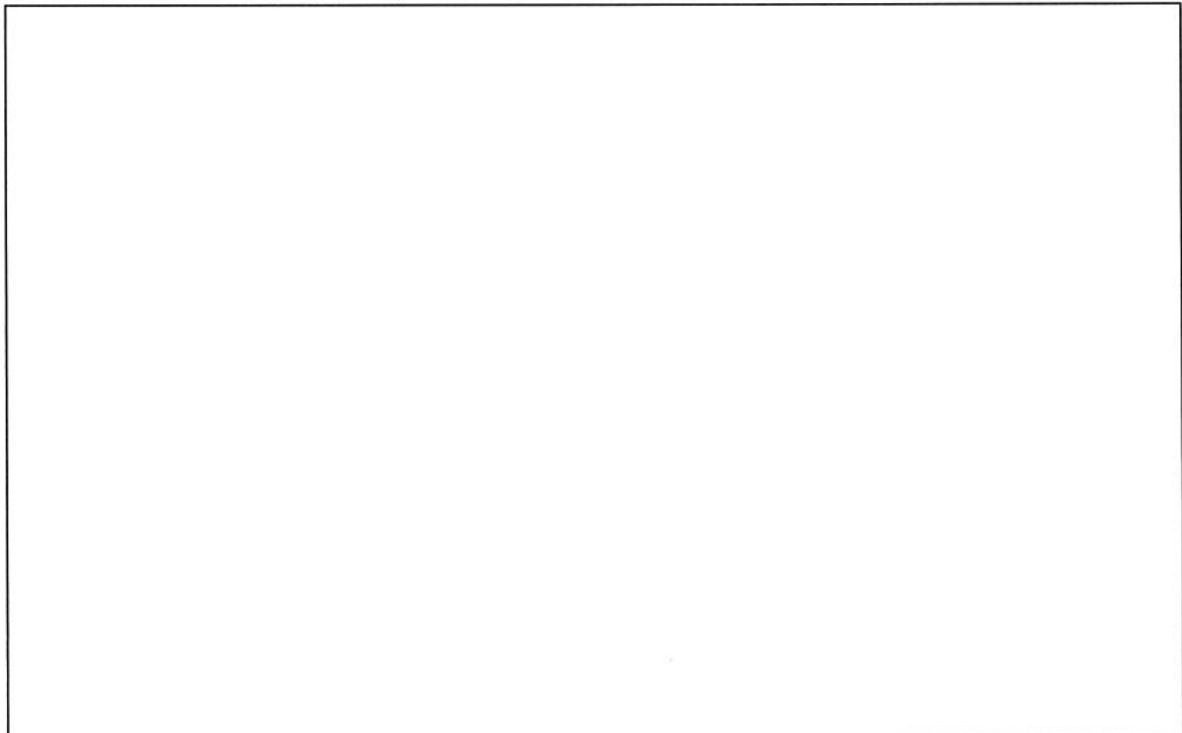
2.6.3 The Authority invites industry views on the time line of spectrum consolidation, i.e. when it should be done.

2.6.4 The Authority invites industry views on demand for IMT migration of 5 MHz taking into consideration the spectrum for IMT available in the 700 and 800 MHz bands.

2.6.5 The Authority invites industry views on need-based differentiated spectrum assignments in the 880-915 MHz (paired with 935-960 MHz).

A large, empty rectangular box with a thin black border, intended for industry views on need-based differentiated spectrum assignments in the 880-915 MHz (paired with 935-960 MHz) band.

2.6.6 The Authority invites industry views on demand for IMT migration of 10 MHz, taking into consideration the new spectrum for IMT in 700 MHz and 800 MHz.

A large, empty rectangular box with a thin black border, intended for industry views on demand for IMT migration of 10 MHz, taking into consideration the new spectrum for IMT in 700 MHz and 800 MHz.

2.7 IMT2300 unpaired spectrum TDD

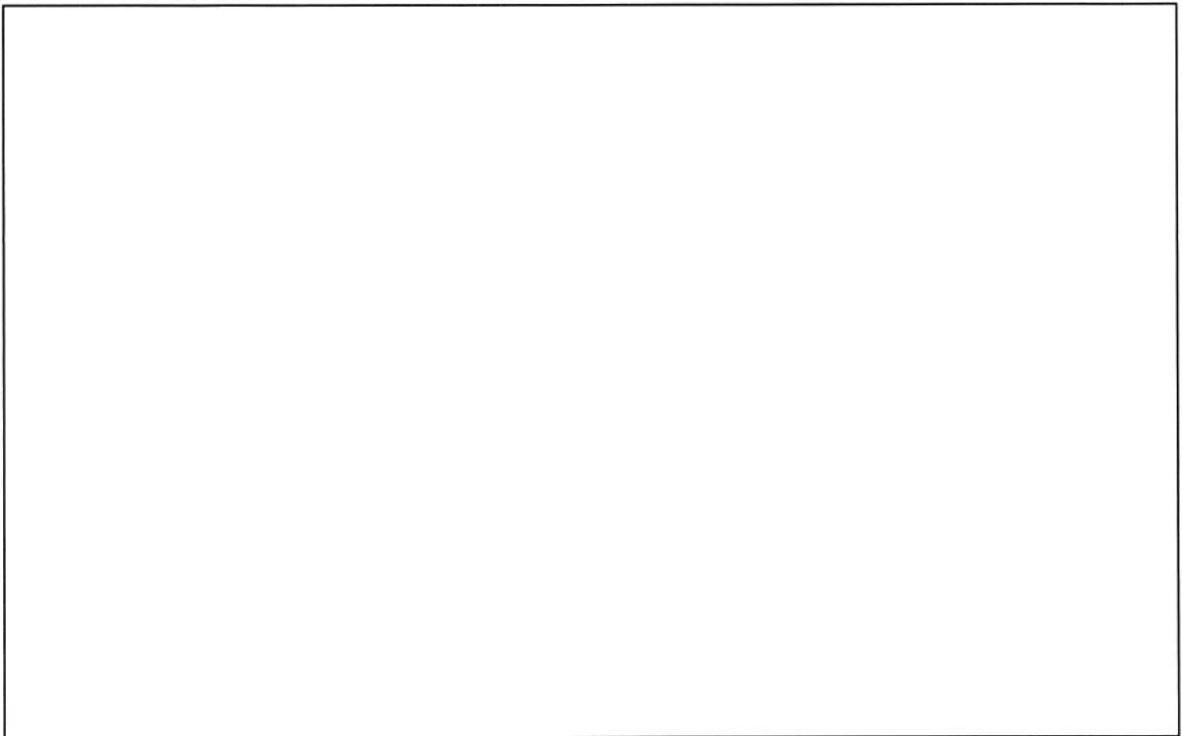
2.7.1 The Authority invites industry views on usage of 2380-2400 MHz.

The City requires additional spectrum in this range to be used for HIGH bandwidth Public Sector Safety and Security Data networks. LTE data applications are now available for data usage in this frequency range. Public sector Safety and security requires a private network as these systems are used for switching of traffic signals and for data modules on law enforcement and disaster management vehicles. The City is therefore of the view that 15MHz unpaired TDD should be reserved for public safety and security allocation on a regional basis in this range

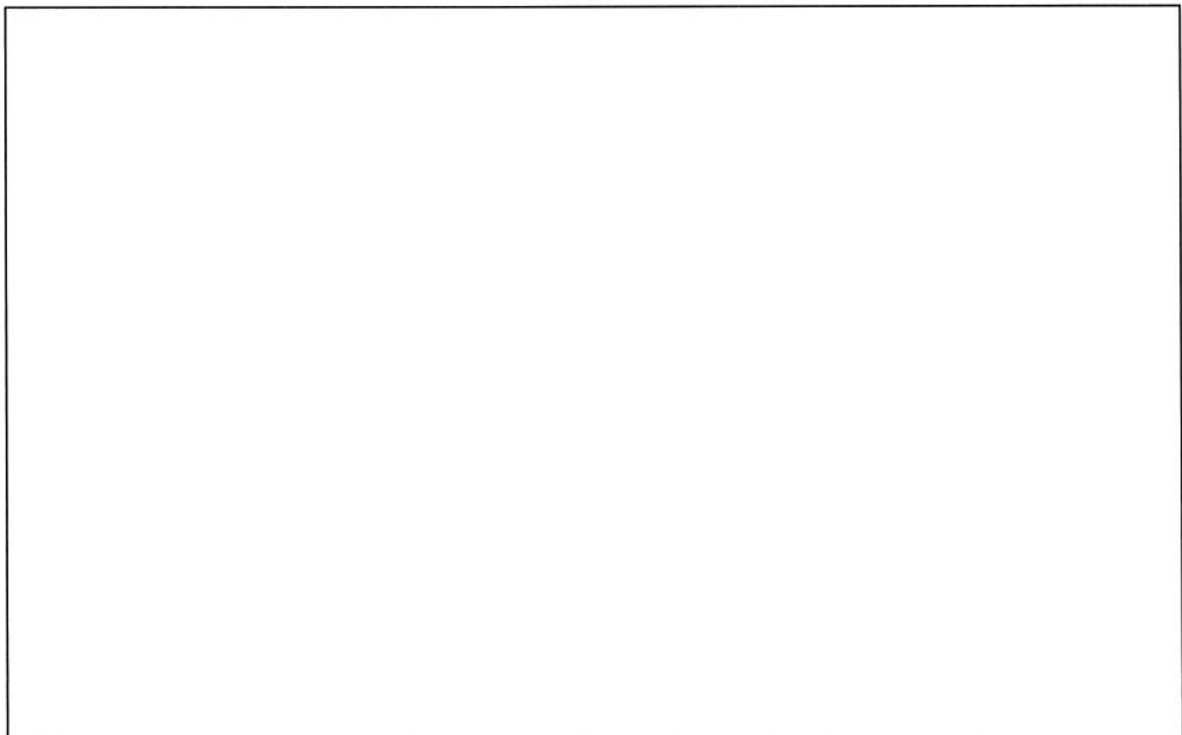
2.7.2 The Authority invites industry views on usage of 2290-2300 MHz for IMT.

2.8 IMT2600 paired FDD spectrum

2.8.1 The Authority invites industry views on demand in the IMT2600 FDD band.

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2.8.2 The Authority invites industry views on the migration of the incumbent (WBS), into 2380-2400MHz.

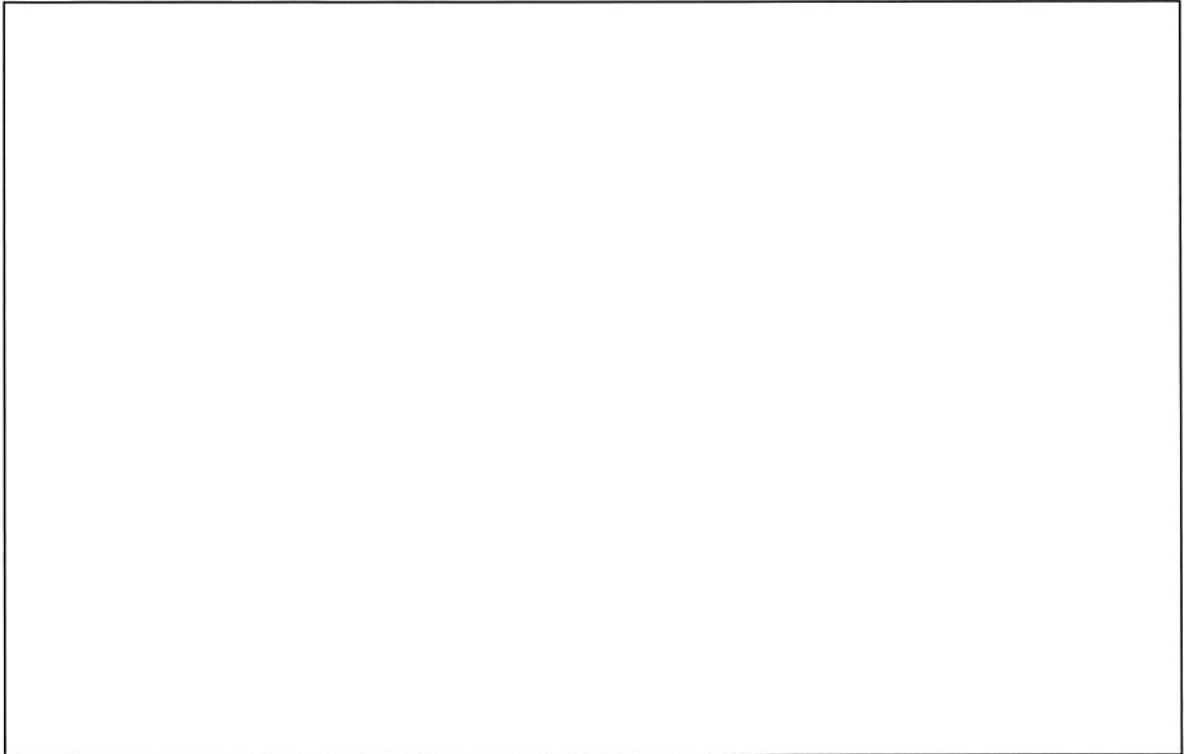
A large, empty rectangular box with a thin black border, intended for industry views on the migration of the incumbent (WBS) into 2380-2400MHz.

2.8.3 The Authority invites industry views in-band migration of the incumbent (WBS), into IMT2600 unpaired spectrum.

2.8.4 The Authority invites industry views on alternative destination bands for the incumbent (WBS).

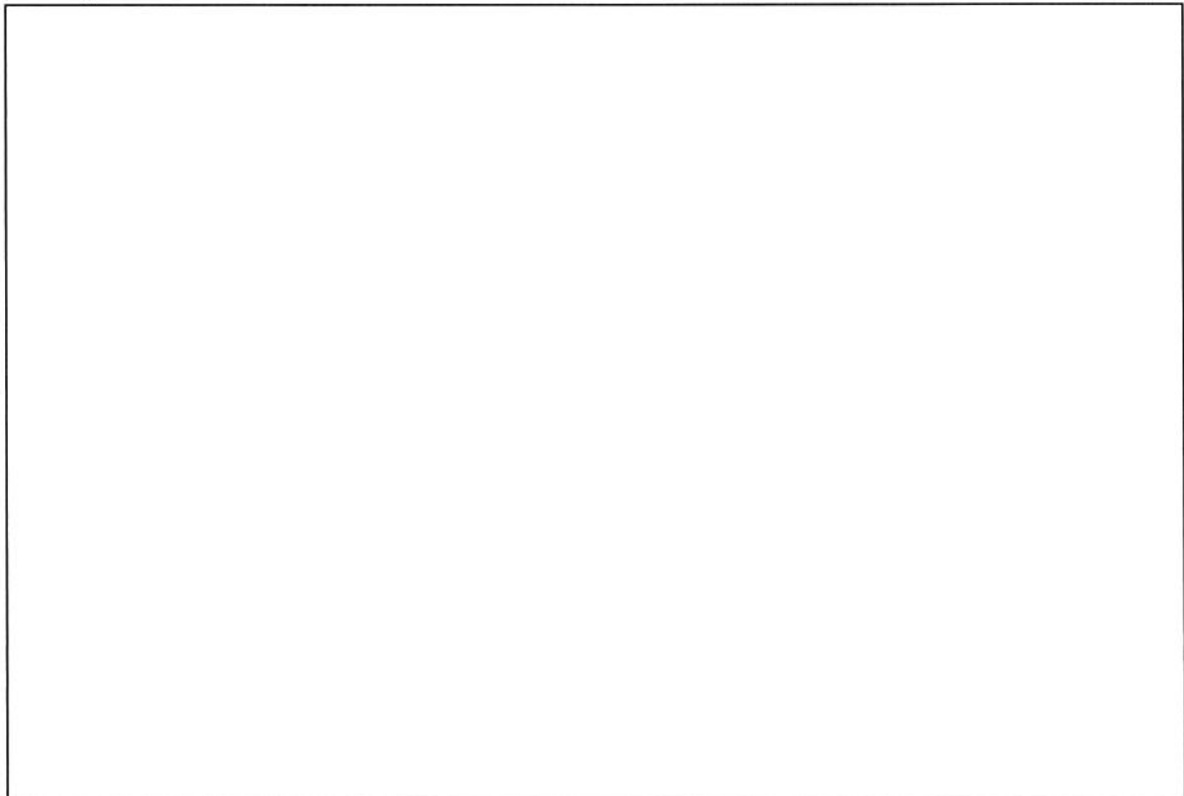
2.9 IMT2600 unpaired TDD spectrum

2.9.1 The Authority invites industry views on demand in IMT2600 TDD band.

A large, empty rectangular box with a thin black border, intended for industry views on demand in the IMT2600 TDD band.

2.10 IMT3500 unpaired TDD spectrum

2.10.1 The Authority invites industry views on migration out of 3400-3600 MHz from FDD usage to TDD.

A large, empty rectangular box with a thin black border, intended for industry views on migration out of 3400-3600 MHz from FDD usage to TDD.

2.10.2 The Authority invites industry views on status and time line.

2.10.3 The Authority invites industry views on interest in TDD downlink focused spectrum.

2.10.4 The Authority invites industry views on interest in TDD uplink focused spectrum.

2.10.5 The Authority invites industry views on interest in the introduction of a Managed Spectrum Park.

2.11 Operators opinion on one TDD-operator instead of every operator having parts of TDD spectrum

2.11.1 The Authority invites industry views on the TDD spectrum bundling of IMT450, IMT750 and IMT2600 and assignment to one (wholesale) operator.

The City is opposed to this view and believes that TDD allocation for public sector usage must be allocated on a regional basis (municipality level) and not under the control of a wholesaler

2.11.2 The Authority invites industry views on the operator interest in individual IMT3500 assignments per operator or in one assignment to one (wholesale) operator.

The City is opposed to this view and believes that allocation for public sector usage must be allocated on a regional basis (municipality level) and not under the control of a wholesaler

2.12 Universal service obligations for lower frequency bands (sub-1GHz)

2.12.1 The Authority invites industry views on universal service obligations for lower frequency bands (sub-1GHz).

The City is of the opinion that universal service obligations must be linked to the commercial attractiveness of the service. Where spectrum is being used for public sector management, safety and security and disaster management, then such spectrum should not involve universal obligations

2.13 Capacity licence obligations for new and existing IMT bands

2.13.1 The Authority invites industry views on licence obligations for new and existing IMT bands, including infrastructure sharing.

Infrastructure sharing and transparent pricing should become license obligations on a conditional basis

2.14 Additional input

2.14.1 The Authority requests any other inputs that are deemed necessary and appropriate which should be taken into consideration.

The City of Cape Town welcomes the SA Connect strategy and the invitation to comment on the Draft IMT Roadmap.

The City of Cape Town welcomes any measures to expand the availability of broadband access. We therefore broadly support the intentions as laid out in the documents mentioned above.

The City of Cape Town is itself engaged in the development of open access fibre optic network infrastructure across the Cape Town metropolitan area, that will be used by licensed electronic communications network service (ECNS) providers and electronic communication service (ECS) providers to establish electronic communications networks to offer competing, commercial electronic communications services at the retail level.

The city commends ICASA for a very well-considered investigation and report on IMT spectrum and trusts that the department will consider making adequate spectrum available for public safety and security in all three tiers of government and that such spectrum will be shared using systems that are jointly funded and managed to the benefit of the country as a whole. The City is concerned that the Draft IMT Roadmap is very limiting in its response requirements and does not take into account the broader requirements of government, especially local government – for licensed spectrum. The technocratic approach to spectrum planning – does not deal in any measure with the needs to government for systems such as Public Safety Networks and Municipal Infrastructure management networks.

