

IMT Roadmap



Invitation to Comment on the Draft IMT Roadmap

August 2014

IMT Roadmap

1 Cover Sheet

Title

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Representing (self /organisation)

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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 Andy Louis at SandtonDate 7 October 2014

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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.

Yes as per WRC'07 Res.224. Spectrum already allocated for IMT. Will remain to be seen if mobile (cellular) handsets are capable of tuning to this range of frequencies.

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

No comment (not applicable to our industry)

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

No comment

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

No comment

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

No comment

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

Para 9.1.2. It is unrealistic to assume that ASO would have occurred by mid-2015 when there is still no firm date for the start of manufacture of STB's for DTT reception. A more realistic ASO date would be 2016 (mid-year). It must also be noted that according to the ITU, from June 15 2015, countries will not be protected from neighbouring interference (if any would exist). There are no other penalties or consequences.

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2.1.7 The Authority invites industry views on destination bands.

No comment, other than an observation regarding costs. The Authority has suggested that costs to be incurred by all licensees migrating out of the band. As correctly stated [A.S.3.3 pg 153] this is complicated and unfair to the incumbent - why should they have to pay to vacate the band? This needs further investigation. Perhaps an auction process for the newly available spectrum, proceeds can then be allocated to finance the incumbents migration.

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

No comment.

2.2 IMT700

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

It would make logical sense to not adopt this option, due to the tailoring towards the Asia-Pacific (Region 3). However most Telecoms equipment manufacturers are based in this region, and are (or will be) building equipment according to their Regional specifications.

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

This option would suit the African, SADC and SA market, being part of Region 1.

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

This slight variation on Option 2 seems to be better than Option 1, but will remain to be seen if better than Option 2 - further studies will hopefully show.

2.2.4 The Authority invites industry views on 2x3 MHz IMT band of ITU Region 1 solution.

No comment

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

Agree with all Region 1 assignments

2.3 IMT750

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

No comment

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2.4 IMT800**2.4.1** The Authority invites industry views on Option 1 (ITU Region 3).

No comment

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

No comment

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

No comment

2.5 IMT850**2.5.1** The Authority invites industry views on the migration of incumbents (Neotel, etc.) out of the band.

No comment

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2.6 GSM900 spectrum consolidation**2.6.1** The Authority invites industry views on spectrum consolidation.

No comment

2.6.2 The Authority invites industry views on guard bands.

No comment

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

No comment.

- 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.

No comment.

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

No comment

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.

No Comments

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2.7 IMT2300 unpaired spectrum TDD**2.7.1** The Authority invites industry views on usage of 2380-2400 MHz.

There are still numerous Outside Broadcast links operating in this band. Although Telemedia no longer has any equipment in this band, we know that the SABC have links operating in this range. What is the proposed migration band?

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

No comment

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2.8 IMT2600 paired FDD spectrum**2.8.1** The Authority invites industry views on demand in the IMT2600 FDD band.

Should follow worldwide option 1 - equipment manufacturers will already be making the necessary RF devices for this frequency band.

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

In agreement. In my personal capacity, I am an iBurst customer, and have always struggled with data rates/speeds whilst at home. Hopefully my connectivity will improve with their migration - more available bandwidth and better RF propagation.

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

This would not be a good idea. iBurst would operate much more efficiently and effectively in the lower 2.4GHz band. Although the iBurst technology is built on a fixed user's location, its major advantage is the mobility of the PC terminal being able to operate anywhere within the coverage area.

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

No comment.

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2.9 IMT2600 unpaired TDD spectrum

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

No comment

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.

As a major C-Band satellite service provider, our Teleport and C-Band SNG's have been negatively affected by the re-allocation of ~~this~~ the extended C-Band range to FDD/Wimax TDD terrestrial services. We have repeatedly urged satellite owners/operators such as Intelsat, Eutelsat, SES, Amqs, etc... to provide C-Band spectrum ~~below~~ above 3.6GHz. But unfortunately there is very little available, especially for an occasional use SNG's. Please see the accompanying NAB Presentation addressing the proposed re-assignment of the entire C-band spectrum

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

No comment - will only really affect WBS.

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

No comment

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

No comment.

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

No comment.

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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.

In the interests of spectrum availability to all licensees, and the potential for a monopoly to form, it would probably be best for these bands NOT to be bundled together. However, perhaps one operator could take each of these bands: IMT450 to x, IMT750 to y and IMT2600 to z. But even then, only three operators have been catered for.

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.

As above, Awareness of anti-competitive policies + fairness of allocation must be upheld.

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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).

While the USO objectives of the SA Connect initiative are very ambitious, it must be stressed that it will come at a cost. Coverage of the entire population will not facilitate better communication if it is not affordable for the man in the street. One cannot expect the rollout to be funded by Telecoms companies alone but Government cannot properly afford it either. Supply vs Demand must also be considered. Economies of scale, and the rapid rate of urbanisation, will ultimately result in wasted time, money and spectrum trying to provide mobile broadband to poor people in rural areas.

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.

All existing IMT bands should be utilised more efficiently, before new spectrum is made available. The 3.4 to 3.6GHz band can be used more extensively, since it was stolen from the C-Band FSS allocation.

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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.

There have been many studies, most notably from the ITU itself, documenting the unrealistic growth (and therefore demand) of /for mobile broadband spectrum statistics being generated. The international Spectrum Advisory community is indicating that Telecoms companies are inflating their projected / forecasted demand, in order to obtain more spectrum. Careful consideration must be taken to ensure that the IMT demand is not too "greedy" for spectrum.

