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Independent Communications Authority of South Africa (ICASA)
Block B, ICASA, Pin Mill Farm
164 Katherine Street
Private Bag X10002
Sandton, 2046

Attention: Mr. Manyapelo Richard Makgotlho

Gentlemen

We refer to the Invitation from ICASA to provide comments on the "Draft Frequency Migration Regulation and Radio frequency Migration Plan".

We are specifically very concerned about the possible reallocation of the satellite C-Band frequencies to WIMAX or BFWA.

Throughout Southern Africa, a number of small NGO Broadcasters have sprung up providing General Entertainment to local Communities on a Regional or National basis. Over and above this, the National Broadcasters of many Emerging Countries in Africa are starved of good programming content as indeed are the second channel broadcasters all of whom are suffering from budget constraints and need to get good quality programs at inexpensive prices. A number of philanthropist International Broadcasters have latched onto this requirement. There are typically Deutsche Welle, CFI, BBC World, Reuters, CNN and others who distribute their programming throughout the World on high power C-Band Global or hemi-beams some of them making use of the lower band or the extended C-Band. Many Broadcasters including the SABC, Multichoice and a number of Religious Broadcasters are making use of low cost small aperture C-Band satellite Earth Stations to receive their International traffic for rebroadcast on a Direct-to-Home basis. Over recent years we have found that already a number of these installations are subject to increasing heavy interference from FRA and WIMAX systems operating in the extended C-Band range around 3.5GHz and 3.6GHz. Such transmissions are normally of significant power and are radiated close to the receive dishes of the local broadcasters causing horrendous interference and in many cases total obliteration of the required incoming signals.

Most of the Emerging Broadcasters in Africa are unfortunately not in a position to pay for last mile connectivity from C-Band downlinks at Telecommunication Ground Stations which are often situated in Remote Areas shielded from Terrestrial Interference. The Broadcasters have to rely on local dishes which are often in Urban Areas where the presence of FRA and WIMAX is a serious problem.

We recently encountered severe interference on an installation that we had done on the planned reception of the Beijing Olympics which was proposed to be sent on a World feed using extended C-Band of Intelsat-7 at 68.5°.



At the time, we copied to you the Spectrum received at these frequencies in an attempt to get ICASA to reconsider the allocation of this frequency band for WIMAX since it prohibited Multichoice from receiving the proposed Olympics carrier from Beijing since most Teleports were affected by the Interference. Now you plan to encroach even further into the recognised C-Band satellite downlink frequencies.

We feel it is important to bring this to your attention since the C-Band frequencies are ideal for use for distribution of Television content as well as contribution. These signals are not affected extensively by rain fade and C-Band normally form the basis of distribution from the Studios to Terrestrial transmitters a requirement that will be significantly increased to cater for the roll out of DTT.

Whilst we understand the intention behind encouraging extensive use of Wireless local loop systems, we have found that there is no way that both C-Band satellite reception and WIMAX services can co-exist in the same frequency band or even in close proximity. The severe interference that is received on a C-Band receive dish (TVRO) as a result as of, for example, a garage installing a Credit Card swiping Radio link as much as 2KM or 3KM from a Television Broadcasting facility will cause sporadic and horrendous interference to Millions of viewers. So, although such a C-Band BFWA may affect only one dish, that dish generally is being used to convey program material to Millions of TV Viewers throughout the country.

We must ask ICASA to reconsider this proposed reallocation.

Some previous correspondence on these problems is attached.

Kind Regards

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