



22 January 2016

**ICASA**

**Attention:** Mr. Manyapelo Richard Makgotlho

E-mail: [rmakgotlho@icasa.org.za](mailto:rmakgotlho@icasa.org.za)

Dear Sir

SUBMISSION ON DISCUSSION PAPER ON THE FRAMEWORK FOR DYNAMIC AND OPPORTUNISTIC SPECTRUM MANAGEMENT 2015

1. ISPA refers to the Discussion Paper on the Framework for Dynamic and Opportunistic Spectrum Management published by the Authority for comment on 15 September 2015 (“**the Discussion Paper**”).
2. It is not ISPA’s intention to submit a full set of responses to the questions posed in the Discussion Paper: rather we wish to:
  - 2.1. Endorse the views set out in the submission made by the Wireless Access Service Providers’ Association (WAPA), a copy of which has been provided to us. ISPA supports the introduction of access to TVWS on a licence-exempt, managed basis.
  - 2.2. Record our support for the process undertaken by the Authority.
  - 2.3. Record our agreement with the benefits to be realised from implementing dynamic spectrum assignment identified by the Authority in the Discussion Paper. In particular, ISPA believes that enabling access to TVWS on a licence-exempt, managed basis will in turn enable greater competition in the provision of network access and backhaul services, particularly in rural areas, while creating opportunities for innovation in service delivery across the value chain. Allowing access in this manner would – we submit – be a game-changer in addressing the bottleneck in affordable access services outside of the major metropolitan areas.

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**ISPA Management Committee:**

Ant Brooks\*, Graham Beneke, Anthony Engelbrecht\*, Guy Halse, Jenny King, Mlindi Kgamedi\*, Duncan Martin, Mohammad Patel, Mike Silber, Warwick Ward-Cox, Elaine Zinn\* (\*ex officio)

2.4. Emphasise the potential for enabling licence-exempt, managed access to TVWS to increase by orders of magnitude the amount of radio frequency spectrum available in South Africa. Addressing spectrum scarcity in sub-1GHz bands will ultimately be to the benefit of consumers who will enjoy lower costs realised through competition and the non-passing on a high spectrum fees. Consumers will also see innovation through the Internet of Things and countless other new services which in turn will drive demand for and the uptake of broadband in South Africa.

3. ISPA extends its appreciation to the Authority for the excellent work it has done as reflected in the Discussion Paper. We will continue to be enthusiastic participants in this process.

Regards

ISPA REGULATORY ADVISORS