

30 January 2023

Independent Communications Authority of South Africa

Attention: Bethuel Nkgadime

Per email: BNkgadime@icasa.org.za

NOTICE OF INTENTION TO AMEND ANNEXURE B OF THE RADIO FREQUENCY SPECTRUM REGULATIONS, 2015

1. ISPA refers to the proposed amendments to Annexure B of the Radio Frequency Spectrum Regulations, 2015 (“**the proposed amendments**”) published as General Notice 1527 in Government Gazette No. 47792 of 21 December 2022 and the invitation to comment thereon.
2. ISPA welcomes and supports the proposed amendments.
3. In particular, ISPA strongly supports the inclusion of the lower 6 GHz (5925 – 6425 MHz) in Annexure B of the Radio Frequency Spectrum Regulations. ISPA agrees that this will provide a much-needed boost for last-inch or indoor connectivity distribution and enable IoT usage in South Africa.
4. This is an important issue for ISPA members. In December 2022 ISPA issued a press release - [Slow Internet in the Home Could be Due to Wi-Fi Bottlenecks](#) – which speaks directly to the challenges caused to ISPs by a lack of spectrum allocated for license-exempt use of Wi-Fi.
5. ISPA calls on the Authority to monitor closely the implementation of the proposed amendment with a view towards:
 - 5.1. Expanding the allocation to the whole of the 6 GHz band taking into account the jurisdictions around the world which have already done this¹; and
 - 5.2. Expanding the allocation to allow outdoor use subject to interference mitigation requirements such as the use of an Automatic Frequency Coordination (AFC) database.
6. In conclusion, ISPA reiterates its appreciation of the work done by the Authority to enable better connectivity for South Africans.

Regards,



ISPA Regulatory Advisors

¹ See <https://www.wi-fi.org/countries-enabling-wi-fi-in-6-ghz-wi-fi-6e>