



## **GSM Association Response to the Department of Communications' Draft Radio Frequency Spectrum Policy**

### **INTRODUCTION**

The GSM Association thanks Minister Nyanda and the Department of Communications for the opportunity to respond to its Draft Radio Frequency Spectrum Policy. Indeed, we welcome many of the underlying themes behind the development of the policy itself. Issues such as ensuring spectral efficiency to maximise consumer benefit, the harmonised use of spectrum along international guidelines and a nation's development of communications services to promote economic growth – all of which are championed by the Draft Policy – are at the heart of the public policy goals of the GSM Association.

### **EFFICIENT USE OF SPECTRUM**

The GSMA welcomes the Draft Policy's focus on the efficient use of spectrum. Radio spectrum is a valuable resource and should not be wasted. Particularly in the bands below 5GHz, there is a strong demand for spectrum that far outstrips supply in South Africa along with the rest of the world.

It is thus imperative that spectrum licences are granted to those best-capable of using them to their optimal efficiency. Communications networks take time and large amounts of money to roll out. Spectrum should be licensed to those entities who have sufficient resources to best use the spectrum to serve the South African people. Past instances where spectrum has been allowed to lay fallow and unused by those to whom it is licensed can and should be rectified under the terms of the Draft Policy.

### **INTERNATIONAL HARMONISATION**

Global harmonisation is an important spur to the growth of the mobile telecommunications industry. Harmonisation means that equipment manufacturers can realise huge economies of scale and lower prices of equipment significantly as they produce it across a global marketplace. Where spectrum is allocated on a different basis in one country to the next manufacturing costs are significantly higher and consumers are forced to pay more for their mobile phones. There are over three billion subscribers to the family of technologies used by South Africa's mobile phone operators across the world. South Africans can benefit from being members of this global family.

Globally harmonised frequency bands are a rare and valuable national resource. The GSMA applauds the DoC's comments regarding harmonisation and welcomes its

work to further harmonisation regionally. The DoC notes that “piecemeal / ad hoc decisions”<sup>1</sup> have been taken in the past, and the GSMA welcomes the correction of such decisions.

## **DIGITAL DIVIDEND**

The GSMA is pleased to note that the DoC makes specific reference to the opportunities offered by the Digital Dividend. The GSMA believes that digital dividend spectrum is ideal for the deployment of the newest generation of mobile broadband services - Long Term Evolution (LTE). Mobile internet access via these technologies will enable a multitude of new and innovative services, including government, health, education and entertainment services.

It is vital to the mobile operator community that they receive certainty on how and when the Digital Dividend frequencies will be allocated to mobile. Analogue switchover has been pushed back in South Africa and at times, in other places in the world, delays in this process have led to a lack of certainty in the mobile community. This has, in turn, affected the planning of new networks and the provision of new services to rural consumers. The sooner mobile operators have certainty on the issue, the sooner they can confirm their network investment plans and South African consumers can benefit from new services as quickly as possible. Without this certainty operators will be forced to delay investment in their networks.

## **CLEAR, CONSISTENT PLANNING**

Mobile networks take huge amounts of investment and network operators need to plan their development years in advance to cater for demand. It is vital to this development that operators receive clear and consistent guidelines from the regulator about how this planning can occur. Unnecessary expenditure – which will ultimately burden the South African consumer – can be avoided if the mobile community is given clear guidance as to the future spectrum allocations that will enable them to offer more services to more people more affordably.

The DoC recognises the need for both long and short term planning in its Draft Policy and the GSMA would like to underline the importance of this.

## **CONCLUSION**

The DoC’s Draft Policy encapsulates a number of important points that will make better use of South Africa’s radio frequency. Spectral efficiency, international harmonisation and regulation to prevent the hoarding of spectrum are all important policy tools. Implementation of these policies will help the communications market in South Africa grow, while affording spectrum for safety of life and other public services.

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<sup>1</sup> Introduction, 1.1.4

## **ABOUT THE GSMA**

Founded in 1987, the GSMA is the global trade association of the mobile industry, representing more than 750 GSM and 3G mobile phone operators across 218 countries and territories of the world. In addition, more than 180 manufacturers and suppliers support the Association's initiatives as associate members. The primary goals of the GSMA are to ensure that mobile phones and wireless services work globally and are easily accessible, enhancing their value to individual customers and national economies, while creating new business opportunities for operators and their suppliers. The Association's members represent more than 3.7 billion GSM and 3G connections – nearly 90% of the world's mobile phone connections.

The GSMA plays a pivotal role in the development of the GSM platform and the global wireless industry. Much of the GSMA's work is focused on two areas: Emerging Services and Developing Markets. The GSMA helps its members develop and launch new services, ranging from mobile instant messaging to video sharing to mobile Internet access, which will work across networks and across national boundaries. At the same time, the GSMA is heavily engaged in the industry's push to extend basic voice, text and broadband access services to more people and assisting Administrations in developing communications infrastructure in their countries.

More information about the digital dividend is available on our website at:  
[www.gsmworld.com/digitaldividend](http://www.gsmworld.com/digitaldividend)