Dynamic Spectrum Alliance Limited
http://www.dynamicspectrumalliance.org

September 4, 2026

Independent Communications Authority of South Africa (ICASA)
350 Witch-Hazel Road, Eco-Park; Centurion
South Africa

Re: DSA response to "Notice Regarding the Feasibility Studies for Frequency Bands Allocated to the Mobile Radiocommunications Service and Identified for IMT in the National Radio Frequency Plan"

Dear Sir/Madam,

The Dynamic Spectrum Alliance[1] (DSA) welcomes the opportunity to respond to the Independent Communications Authority of South Africa (ICASA) on the "Notice Regarding the Feasibility Studies for Frequency Bands Allocated to the Mobile Radiocommunications Service and Identified for IMT in the National Radio Frequency Plan" published on 24 July 2026.

The DSA supports ICASA's objective of ensuring that South Africa has sufficient spectrum to meet future connectivity needs. That objective is best served by an evidence-based, technology-neutral approach that considers licensed, licence-exempt and shared uses, together with the value each can deliver across South Africa's connectivity ecosystem.

DSA's comments focus on the 6 GHz range. The DSA strongly supports preserving licence-exempt WAS/RLAN access in 5925-6425 MHz and urges ICASA to reconsider its proposed treatment of 6425-7125 MHz as an IMT-only band.

Sincerely,

Dr. Martha Suárez
President
Dynamic Spectrum Alliance

[1] The DSA is a global, cross-industry, not for profit organization advocating for laws, regulations, and economic best practices that will lead to more efficient utilization of spectrum, fostering innovation and affordable connectivity for all. Our membership spans multinationals, small-and medium-sized enterprises, as well as academic, research and other organizations from around the world all working to create innovative solutions that will benefit consumers and businesses alike by making spectrum abundant through dynamic spectrum sharing. A full list of DSA members is available on the DSA's website at: https://www.dynamicspectrumalliance.org/members.

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DSA's Comments to the Consultation and Requested Outcome

The DSA encourages ICASA to adopt a balanced and forward-looking framework for the 6 GHz band that recognises the complementary roles of licensed IMT, licence-exempt WAS/RLAN and coordinated / shared access. In particular, DSA respectfully requests that ICASA:

1. **Preserve licence-exempt WAS/RLAN access throughout 5925–6425 MHz.**
   ICASA should maintain the existing licence-exempt framework across the full 500 MHz of lower 6 GHz and ensure that the forthcoming RFSAP does not introduce unnecessary restrictions that would reduce its utility for Wi-Fi and other WAS/RLAN applications. This spectrum is increasingly important for translating investment in fibre and other high-capacity fixed networks into high-speed wireless connectivity within homes, businesses, schools and public venues. Maintaining the full contiguous allocation also supports efficient deployment of current and future generations of Wi-Fi.
2. **Correct the premise that IMT has primary allocation or regulatory priority in 6425–7125 MHz.**
   The feasibility study should distinguish clearly between a **primary allocation to the Mobile service** and an **identification for IMT**. Identification for IMT does not create a separate primary service allocation and does not establish regulatory priority for IMT over other applications operating within allocated services. This distinction is particularly important because RR No. 5.457E expressly provides that IMT identification does not preclude other applications and recognises use of the band by WAS, including RLANs. The RFSAP process should therefore not proceed from an assumption that WRC-23 requires, or justifies, exclusive IMT use of the band.
3. **Include WAS/RLAN as an explicit option in the 6425–7125 MHz feasibility and RFSAP process and ensure that the RFSAP does not prejudge an IMT-only outcome.**
   ICASA should assess WAS/RLAN alongside IMT and incumbent FS/FSS use before determining the future regulatory framework for upper 6 GHz. Excluding WAS/RLAN at the outset would predetermine the outcome of the feasibility process and prevent ICASA from comparing the economic, technical and connectivity benefits of the available options. The assessment should consider exclusive, segmented and shared-use scenarios and evaluate them on a technology-neutral basis. Pending completion of that assessment, development of the RFSAP should preserve the possibility of licence-exempt and shared access rather than assume that the full band will ultimately be assigned for IMT.
4. **Make at least the 6425–6585 MHz band available for licence-exempt WAS/RLAN.**
   The DSA recommends extending licence-exempt WAS/RLAN access by 160 MHz, from 6425 MHz to 6585 MHz. This would provide South Africa with **660 MHz of contiguous licence-exempt 6 GHz spectrum**, delivering meaningful additional capacity while preserving the substantial majority of upper 6 GHz for consideration of IMT and shared uses. A 160 MHz extension represents a pragmatic and proportionate first step, delivering meaningful additional capacity for licence-exempt connectivity while preserving substantial upper 6 GHz spectrum for ICASA to consider for IMT and shared use.
5. **Assess shared and coordinated access above 6585 MHz before determining whether any spectrum should be assigned exclusively to IMT.**
   ICASA itself recognises that coexistence between IMT and incumbent services may be technically feasible and has invited further comment on shared use. DSA encourages ICASA to apply the same

principle to WAS/RLAN. Rather than assuming nationwide exclusive use, ICASA should examine whether differentiated access conditions based on power, location, deployment environment and frequency can enable additional spectrum use without compromising IMT or incumbent services. This should include consideration of low-power indoor, very-low-power and automated frequency coordination approaches**,** where appropriate. Such mechanisms could enable efficient use of spectrum that might otherwise remain unused in particular locations or environments.

6. **Base the amount of spectrum made available for IMT on demonstrated demand, ecosystem maturity and realistic deployment requirements.**
The feasibility study itself concludes that the IMT device ecosystem for 6425–7125 MHz is limited and that no devices currently support the band. By contrast, 6 GHz Wi-Fi has an established and rapidly expanding global device ecosystem. ICASA should take this difference in ecosystem maturity and the respective timescales for delivering consumer benefits into account when determining the future use of the band.

   The study also records an industry view that blocks of approximately 200 MHz may be required by individual mobile operators in the future. This does not demonstrate a need to reserve the entire 700 MHz band for IMT nationwide, nor that such spectrum could realistically be utilised by IMT within relevant deployment timescales. ICASA should therefore base any spectrum made available for IMT on demonstrated demand, existing mid-band holdings, realistic operator requirements, network and device capabilities, likely deployment timescales and the opportunity cost of withholding spectrum from other connectivity technologies.

7. **Assess the economic value of alternative uses of the band**
ICASA's economic assessment should consider the benefits of WAS/RLAN and shared use alongside the mobile network cost savings associated with making additional spectrum available for IMT. This should include the contribution of Wi-Fi to extending the value of fibre and fixed broadband networks, offloading traffic from mobile networks, supporting enterprise and public connectivity, and benefiting from an established device ecosystem. A balanced assessment of these benefits is necessary before concluding that IMT represents the highest-value use of the band or determining how much spectrum, if any, should be made available exclusively for IMT.

8. **Consider the international trend for spectrum sharing in the upper 6 GHz band**

   The DSA refers ICASA to the proposed approach by Ofcom in the UK regarding expanded access for Wi-Fi services, and Ofcom's recent announcement to extend the frequency range allocated to Wi-Fi by an additional 160 MHz (from 5925–6425 MHz to include 6425–6585 MHz), under the same technical conditions as the Lower 6 GHz band[2]. Ofcom has concluded that decisions can be sequenced: expanding Wi-Fi access now to meet immediate demand while preserving the option to assess mobile use and sharing models later in the decade. Furthermore, Ofcom also published regulations for AFC systems and AFC-managed devices, which will apply across the 6 GHz band. Other European countries, including Germany, are also exploring the potential to use AFC systems, which are also known as a DSACF (dynamic spectrum access coordination function), to enable non-priority WAS/RLAN use in the upper 6 GHz band to make better use of the band while protecting incumbents. This is consistent with statutory duties around

[2] " Expanding access to the 6GHz band for commercial mobile and Wi-Fi services" Ofcom Statement 20 July 2026 available at https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-3-4-weeks/consultation-expanding-access-to-the-6-ghz-band-for-commercial-mobile-and-wi-fi-services/main-document/statement-expanding-access-to-the-6-ghz-band-for-commercial-mobile-and-wi-fi-services.pdf?v=422807

spectrum efficiency, avoids locking up the band prematurely and reduces the "binary choice" framework often presented by other stakeholders.

Conclusion

The DSA supports ICASA's objective of ensuring that South Africa's spectrum framework meets future connectivity needs. Achieving this requires recognising the complementary roles of licensed mobile, licence-exempt connectivity and spectrum sharing, rather than assuming that identification for IMT requires exclusive use of the upper 6 GHz band.

The DSA therefore encourages ICASA to assess the full range of uses for 6 GHz on an evidence-based and technology-neutral basis. Such an approach would preserve regulatory flexibility, promote efficient spectrum use and ensure that South African consumers and businesses can benefit from continued innovation across both mobile and Wi-Fi ecosystems.