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12 November 2010

Dr Stephen Mncube
Chairperson
ICASA
Block B, Pinmill Farm
164 Katherine Street
Sandton

Via Email : Chairperson@icasa.org.za

Attention : Mr Thato Mahapa
Via Email : tmahapa@icasa.org.za

Dear Sir,

RE: UNIVERSAL SERVICE AND ACCESS OBLIGATIONS REVIEW

MTN would like to thank the Authority for the opportunity to make comments on the above notice and herewith submit our comments for your consideration.

Thanking you in anticipation.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Graham de Vries', written in a cursive style.

GRAHAM DE VRIES
GENERAL MANAGER: REGULATORY AFFAIRS
MTN (PTY) LTD

Directors PL Heinemann (Chairman) KW Pienaar (Managing Director)*, Z Bulbulia*, ZNA Cindi, RS Dabengwa,
R Gasant, IN Mkhize, NWC Molope, PF Nhleko, PD Norman, NI Patel, AJ Taylor

Company Secretary: MML Mokoka *Executive

Reg No. 1993/001436/07

Vat Reg. No. 4630140434



**MTN'S RESPONSE TO THE NOTICE OF ICASA'S
DISCUSSION DOCUMENT ON UNIVERSAL SERVICE
AND ACCESS OBLIGATIONS REVIEW AS
PUBLISHED IN GOVERNMENT GAZETTE NO 33467
DATED 17 AUGUST 2010**

12 November 2010

Mobile Telecommunications Network Pty (Ltd)

1. Introduction

Mobile Telecommunications Network (Pty) Ltd (hereinafter MTN) would like to thank the Independent Communications Authority of South Africa (ICASA) for the opportunity to comment on the Discussion Document on “Universal Service and Access Obligations review” published in Government Gazette No.33467 of 17 August 2010.

This submission to ICASA seeks to clarify MTN’s views on Universal Service and Access Obligations (USAO) and to request assistance from ICASA in resolving some of MTN’s challenges relating to the rolling out of MTN’s License obligations.

2. Introduction

MTN has prepared its submission in line with the Discussion Document framework. We have studied the Discussion document in conjunction with the licensing framework as stipulated in Chapter 3 of the Electronic Communications Act, No. 36 of 2005 (ECA), and we are also referred to all our license obligations as required by the Telecommunications Act of 1998.

We have noted that the framework accentuates the importance of Universal Service and Access Obligations (USAO) and the role it plays for developing communities within South Africa. The Authority also refers to the license conversion process, existing obligations and review of the existing license obligations.

MTN’s interpretation of the obligation’s review is based on reference to various sections in the ECA relating to USAO. Section 93(4)(b) of the ECA states that *“As part of the conversion process, the Authority may grant rights and impose obligations on the licensee, in order to ensure that the existing licenses comply with this Act, including the continuation of any obligations imposed upon existing licensees by virtue of a previous determination. Such obligations remain in force until such time as the Authority completes a review in terms of section 67(8).”*

In our view the existing license obligations remain in force until ICASA has done a market review of universal service needs and aspects in terms of section 67(8), it is only then that the Authority can review the license obligations. We submit that the USAO review process is a commendable initiative that will begin to ensure that our economy will continue to grow as those individuals that may not yet have access or the means to access communications will be enabled to do so and thereby bridging the digital divide.

It is MTN's view that the current license obligations be kept as they are until a Market Review study has been undertaken. However, it is important that the regulator addresses the issue of USAO in a holistic manner. That is that the regulator considers the obligations of all licensees including all other converted licenses (i.e) VANS that had no license obligations and have now been converted to have licenses that are equivalent to what MTN has (i.e.) Individual Electronic Communications Network License (IECNS) and Individual Electronic Communications Service (IECS). MTN submits that all I-ECNS licensees will have to be treated in a non-discriminatory way as it relates to the imposition of USAO's.

We recommend that until the market review process as it relates to universal service obligations is finalised and the full extent of the resources that is needed to achieve Universal service and access is identified, no additional USAO license obligations be imposed. This time period could be utilised to understand and put the necessary plans in place to overcome the challenges we've experienced in the past in delivering USAO. It would also include a process of analysing the scope of work that is needed to provide Universal Access and Universal Service to the whole of South Africa. After completing this exercise the Authority can distribute license obligations evenly amongst all licensees.

3. General Comments:

3.1 Review Process and Regulatory Framework:

MTN supports the review of current license obligations to the extent that the review process would assess the resources needed to achieve the targets relating to Universal service and Universal access but also assess the fulfilment of the obligations. MTN is also of the view that the process should also consider reviewing

the obligations (roll out plans) of the converted VANS licensee to the extent that such roll-out obligations exist. We would however, like to reiterate our view that for review of the current obligations to take place, compliance with section 93(4)(b) of the ECA is necessary.

It is MTN's view that the Authority should play an advisory role that would seek to assist with challenges that have led to non compliance and should further play a monitoring (Compliance) role after roll out to help with sustainability of the projects.

We support the Authorities intention to make regulations on USAO informed by this process. MTN recommends that the regulations incorporate a transparent and non discriminatory way of allocating obligations to all licensees and that there should be sunset clauses linked to USAO so that licensees would have certainty that it would not have to carry social obligations indefinitely.

3.2 Conceptual Issues:

MTN fully supports the notion of attempting to ensure that every citizen in the Republic is properly provided for in terms of universal access and universal service to communications and broadcasting services. However, we would like to avoid a situation where the provision of a USAO would mean providing an uneconomical social service which would put an unreasonable and detrimental financial burden on the operator. It is therefore important that in deciding on the model to use the Authority, look at the least burdensome model that will achieve the desired goal.

In setting the targets the Authority should refer to the Universal Service Access Agency of South Africa (USAASA) document (*Government Notice 85 of 2010, Government Gazette No 32939*) published on 08 February 2010, title *Determination issued under the Electronic Communications Act 2005 (no 36 of 2005) with regards to Universal Access to and provision of Electronic Communications Service and Electronic Communication Network Services*.

MTN believes that this will set the tone for the other Authority on how to evenly distribute universal service obligations over the next few years.

There are various policy initiatives that the Department of Communications and the Authority have engaged in to close the Market Access Gap such as the licensing of

Under Served Area licensees (USAL's) in 2005. The existing operators have assisted in terms of sharing their networks with these regional licensees in an attempt to make it sustainable. It is our view that it would be proper for the Authority to take the lead and in conjunction with industry to do an analysis of the Market Access Gap and based on the outcome define a priority list of undeserved areas or communities. Such a report which would for example include a detailed analysis of what the impact of USAL's had been on the provision of Universal Access could help the industry to understand whether some of these initiatives work or not and what the challenges in this environment are.

4. Specific Comments:

Services Included within the USAO:

The Authority would have to find a model that would promote effective and efficient use of the networks and services that would have been provided as a result of the obligations. The Authority would have to devise a USAO strategy that would be customised for the South African environment. However, putting the financial burden on the operator by introducing supportive services, like training, power, maintenance and operational costs should not be part of the USAO.

Monitoring of Entities that have USAO obligations:

The Authority as a custodian of USAO should find meaningful ways of assisting in delivering on these obligations. In the past the operators had a regulatory obligation to submit License Obligation Reports, in these reports the operators have repeatedly alerted the Authority of their difficulties to comply with their license obligations because of operational issues associated with the obligations.

Therefore, MTN recommends that operational issues that are associated with delivery should be dealt with via USAASA ("the Agency"). Implementation plans agreed to by the agency and the relevant operator could be signed off by ICASA as the custodian of USAO. MTN believes the Agency is well placed to monitor the progress of projects, it in terms of section 90 of the ECA. In addition, MTN are of the view that section 81(c) of the ECA acknowledges the Agency's administrative role in rolling out of USAO.

USAO strategy and the Choice of Model:

Publications such as the Department of Communications (DoC) Broadband Policy¹ and the Minister's of Communications Determination issued 8 February 2010², suggests that the forward looking perspective regarding USAO objectives could be directed towards driving broadband or Internet connectivity and affordability of internet services. The lack of infrastructure, reduced demand of the service as well as lack of knowledge and capacity has been identified as factors that have influenced USAO. The countries benchmarked in the Discussion Document appear to have a clear strategy on how to achieve their USAO's irrespective of the fact that they are faced with challenges.

The Authority has proposed four different models with the first one being a preferred model:

1. *Pay and Play are coordinated, with participation in the competitive tender process broadened.*
2. *Pay and no Play and more inclusive competitive Tendering*
3. *Pay and no Play*
4. *Pay or Play*

MTN submits that before a specific or particular model is chosen there are a number of aspects that need to be clarified. In the first instance it should be ascertained what the exact size of the problem is that need to be addressed. In other words, based on the US and UA targets as determined, what resources need to be deployed to attain those targets. Of critical importance is that a detailed cost analysis be done to ascertain the extent of the funds that would be needed to ensure US and UA as defined. It is only when there is a clear understanding of what resources would be needed to attain UA and US (as determined), underpinned by a detailed cost analysis that the question of whether any of the models as proposed would be appropriate. The Authority is urged to choose the least intrusive model to achieve the desired result.

¹ Department of Communications intention to make South African Broadband policy as published in government gazette no. 32578 dated 18 September 2009

² Determination issued under the EC Act, No, 36 of 2005 with regard to Universal Access to and the universal provision of Electronic Communication Services and Electronic Communications Network Services.

The focus of US and UA programmes

ICASA makes the following statements in paragraph 9.12 of the discussion document:

“The criterion adopted by the European union that a service should only qualify for US or UA investments when it has achieved majority penetration through commercial or market forces, may be appropriate for wealthy countries but may have to be rejected by other countries. In the case of developing economies, adherence to this criterion could frustrate their ability to meet the time tables embodied in the worthy and ambitious goals of social and economic development embodied in the millennium Development Goals”

MTN does not necessarily agree with this statement. Competition in the mobile industry has had the positive effect of more than 98% population coverage and land Coverage of more than 77.41% from a mobile perspective. Competition has brought about innovative services such as prepaid and MTN Zone which has played a significant part in contributing to universal access and universal service. Competition pushed the mobile industry to do a rapid and continuous infrastructure roll out. And it is this infrastructure roll-out that has lead to the current status of penetration rates. South Africa is already a global leader in terms of voice connectivity, with mobile (SIM) penetration of above 100%. This has been wholly achieved through network-based competition.

Broadband penetration, on the other hand, is lagging behind. Again, mobile is increasingly filling the gap: (14.4 Mbps) 3G covers more than 47% of population and delivers more than 60% of SA Broadband connections today. Substantial investment has been earmarked to further expand mobile Broadband coverage and speed (see exhibit 3).

Implications for policy are stark. Past focus on international connectivity and national broadband backbones now needs to shift to Access. The critical choice for South Africa is whether it wants more service providers to share the same Access infrastructure or whether the primary objective is more Access infrastructure investment.

Because a new step function wave of investment is required, the old service v/s network competition dilemma has returned. Of course this is not an all or nothing

decision, but clarity on the bias of policy is required to inform regulation and future investment decisions. This is because the scale of investment required to bring Broadband to All is unlikely to take place if a policy choice is made that “*worthy and ambitious goals of social and economic development embodied in the millennium Development Goals*” can only be achieved through the imposition of some form of UA or US obligation and not a competitive infrastructure market that is appropriately incentivised.

Rather, network competition should be allowed to deliver more, cheaper access to more people, in more places. Cherry-picking will not deliver Government’s Broadband inclusiveness objectives. The imposition of Universal Service or Access obligation or indirect access remedies should therefore be treated with much caution in competitive infrastructure markets like mobile, because these policy choices or remedies, designed for fixed Western monopolies could have a detrimental impact on competitive network investment and mobile networks in particular.

MTN therefore submits that *the criterion adopted by the European Union that a service should only qualify for US or UA investments when it has achieved majority penetration through commercial or market forces, may actually be appropriate for South Africa as well.*

The role of Policy in delivering Broadband for All objectives

South Africa is competing on the global stage for growth and inward investment. Telecoms infrastructure is a key component of that strategy with globally mobile corporations demanding pervasiveness of access, ever-faster speeds of connectivity and a well connected, IT-literate workforce.

Deploying a pervasive broadband infrastructure that leads the region and can compete globally requires network investment in the order of R100bn, most of which on the access network. Given sufficient time and a healthy, competitive market, these sums will eventually flow in. But to deliver the above objectives in a timely fashion, and across the urban and rural lines, Government must play an active role.

Competing economies are pumping billions of public money into NG broadband networks (Australia R274bn, New Zealand R8.2bn, Singapore R5.5bn, Malaysia

R5.6bn and South Korea R6.9n). But public money is not enough. If South Africa is to maintain its regional telecoms leadership and improve its place in the global investment and ICT league, an ambitious strategy is required that **maximizes the private sector investment capacity**, leverages its leading mobile infrastructure and national champions, and channels public funds more effectively to support the industry.

Conclusion

MTN would like to acknowledge the importance of this process and the impact that it would have to the macro-economy and hence the ICT industry. MTN is of the view that in adhering to section 93(4)(b) we acknowledge our obligations in this regard and trust that the regulator will implement a more consistent approach towards USO which will ensure a level playing field and harness the necessary capacity, skills and resources available from wider base in this new liberalised environment.

MTN is of the opinion that both ICASA and USAASA should ensure that universal service and access (USA) objectives are co-ordinated and the funds available in the USA fund are effectively and efficiently utilised towards the successful implementation USA projects as envisioned in section 90 of the ECA. Furthermore, for the avoidance of doubt, MTN is of the view that all licensees should contribute towards the USA fund in terms of section 89 of the ECA. These USA funds will be utilised solely by licensees who will be incentivised to tender for projects which have been identified by ICASA and USAASA in terms of section 90 of the ECA,

Projects in terms of section 90 of the ECA should not be funded by the USA fund until such time as ICASA and USAASA have conducted a study to ascertain areas which are truly underserved. It is MTN's view that failure to achieve the aforementioned will result in a continuation of the uncoordinated approach which currently exists and will result in continued failure to achieve the relevant objectives of the ECA.

US/UA model related Issues

Legislative Regulatory Issues

Q15.1.1 Must Licensees continue to carry USAOs?
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As only a few licensees, carry USAOs other than payment into the USAF, MTN is of the view that with regard to the new licensing regime this fact is discriminatory and hence should be removed. A more constructive manner to achieve the relevant US and UA objectives, would be to ensure that all licensees contribute the USA fund and licenses are incentivised by those funds to tender for projects as envisaged in section 90 of the ECA.

Q15.1.2 If so:-

15.1.2.1 Which factors/considerations must be taken into account in determining whether a particular licensee or a category of a licensee must carry USAOs or not?

MTN is of the opinion that all licensees envisaged in the ECA must pay contributions to the Universal Service and Access Fund (USAF) in terms of section 89 of the ECA.

Until such time as it is clear that the funds in the USAF is not sufficient to achieve UA or US as determined, no further USAO should be imposed on any licensee. If it clear that the money in the USAF is not sufficient, then only should further obligations be imposed on Licensees and only to the extent necessary to achieve UA and US and on an equal basis between all licensees.

Q15.1.2.2 Which licensee (Electronic Communications Network Service (“ECNS”), Electronic Communications Service (“ECS”) and/ or Broadcasting Service (“BS”)) must carry the USAO’s taking into account the answer to 12.2.2.2

Electronic Communications Network Service (ECNS) license should carry Universal Access Obligations or all network related obligations for a particular line of business they are involved in (i.e. communications, if ECNS is for Broadcasting Networks, then obligations should be for broadcasting) It is our view that spectrum licences should not carry any obligations as they are normally competitive licenses and spectrum is a scarce resource. (We did not manage to find the Authority’s referenced section 12.2.2.2 within the document to answer question in this context.)

Furthermore, there ought to be no reason why all licensees should not have USAO (other than payments into the USAF, but only to the extent if it is found that the money in the fund is not sufficient after a detailed costing analysis).

Q15.1.2.3 Should all licensees or some continue to carry USAOs (ECNS, ECS, and BS) or which, if not all must carry USAO? Indicate what the role of licensees no longer carrying USAOs? Please indicate what the role of licensees no longer carrying USAO) should be towards the goal achieving US/UA. You are requested to provide reasons for your answers.

MTN is of the view that historical obligations should be removed to ensure a level playing for all licensees in a liberalised environment.

Q 15.1.2.4 Do you submit that Licensees falling within the same license category of a license must carry the same obligations, including similarity in terms of nature and quantity? You are requested to refer to experiences encountered in the implementation of the existing obligations, if any.

MTN's view is that the obligation must be consistent with the regulations provided in section 89 of the ECA. Moreover, additional obligations will be taken on by individual licensees who are incentivised by the USAF to undertake projects as envisaged in section 90 of the ECA

ICASA seems to indicate through this questionnaire that there is a difference between a USAO and payment into the USAF. MTN submits that the payment to the USAF is an obligation and is a USAO. As a result MTN believes that all licensees have to carry USAO in the form of a payment into the USAF.

Q15.1.3 What approach should be carried in respect of USAOs imposed under the Telecommunications Act which were not carried over into the converted licenses issued under the ECA? You are also requested to consider what should happen to such obligations which were not carried over into the converted license.

Section 93(4)(b) gives direction in terms of what approach should be taken and is clear on the fact that the Authority may have granted rights and imposed obligations at the

time of the licence conversion process. To the extent that the Authority decided not to impose obligations or not to continue with obligations imposed on a licensee as a result of a determination it had exercised its discretion. Upon the conversion of the licence the conversion process is finalised. If a licensee is in the fortunate position that the Authority did not impose or continue with an obligation it ought to be interpreted to the advantage of that licensee.

As only a few licensees, carry USAOs, MTN is of the view that with regard to the new licensing regime this fact is highly prejudicial and hence should be removed. A more constructive manner to achieve the relevant US and UA objectives, would be to ensure that all communication licensees contribute the USA fund and licenses are incentivised by those funds to tender for projects as envisaged in section 90 of the ECA.

Q15.1.4 What kind of obligations must be imposed on the licensees that you submit need to carry USAOs? You are requested to refer to experiences in implementing the existing obligations, if any, that you think must be taken into account in determining obligations that individual licensees or licenses have to carry. You are requested to deal with BS licensees separately in your answer

MTN's past experiences have shown that license based USAO have proved problematic as the roll-out and initiatives were not driven by demand –side considerations in the market. The problems associated with license based obligations could be mitigated by ensuring that obligations are not placed on individual licenses but rather through the licensee's contribution to the USA fund and these funds being utilised by licensees who have been incentivised by the fund to undertake tendered projects identified by ICASA and USAASA.

Q15.1.5 Would you submit that there is currently a clear or sufficient link between USAO's and the processes undertaken by USAASA and the MDDA in terms of the ECA? You are requested to provide full details in your answer.

It is MTN's view that the ECA has clearly set out the relevant obligations. In addition, it is MTN's view that obligations should not be licensed based but demand-side driven by the identified projects pursuant to section 90 of the ECA. Furthermore, to ensure

harmonisation any interested licensee should be incentivised by the fund when considering a tendered project as identified.

Q15.1.6 What should happen to the obligations which were not completed or implemented at the time of the conclusion of the license conversion or were not carried over into the converted licenses and those that were carried over in the converted licenses, where applicable, and new ones which were imposed upon conversion of the license where applicable?

As long as the historical obligations are consistent with the demand-side projects identified (i.e. as alluded to above) the relevant licensee should have access to the USAF to assist with the fulfilment of the obligation.

Q15.1.6.1 Would you submit that licensees should carry an obligation to maintain the obligation that has already been implemented? Please provide reasons for your answer.

In the licence conversion process the Authority included an obligation in the MTN licence to continue with the obligations previously imposed. Until such time as the licence is amended MTN will continue to comply with the licence condition.

MTN, however, submits that such obligations should not be viewed in isolation in this process of a review of the licence obligations. It is clear that in the conversion process only some and not all licensees have an obligation to not only physically roll out certain USAO but also to pay into the USAAF as a result of the regulation. In essence there are only a few licensees that are both paying and playing. Such playing obligations should be considered when ICASA does this review. It is imperative that in the new regime after the licence conversion process that all licensees are treated the same as it relates to the imposition of USAO's.

Please see answers to Q15.1.6 and Q15.1.5

Q 15.1.7 Must licensees continue to make contribution into the USAF?

In accordance with section 89 of the ECA, all licensees must contribute the USA fund.

Q15.1.7.1 If so taking into account your answer above on whether licensees should carry or not carry USAOs, would you submit that the existing amount of contribution is or would you is sufficient?

MTN submits that it is more than sufficient considering that the funds in the USAF has not been utilised over the past few years. The funds paid by operators cannot currently be utilised by the industry, more so, there also needs to be a cost analysis done to ascertain the extent of the funds that would be needed to ensure US and UA as defined. It is only when there is a clear understanding of what resources would be needed to attain UA and US (as defined), underpinned by a detailed cost analysis that the question of whether the fund or contributions are sufficient would be constructively answered.

MTN believes that the contributions are sufficient and consideration must be given to the fact that licensees have been contributing to this fund for numerous years. If properly managed by financial advisors, the fund amount is sufficient and significant.

Q15.1.7.2 If not so from which sources do you think the USAF should be funded?

MTN is of the view that the USAF should be sourced as envisaged in terms of section 89 of the ECA

.Q15.1.7.3 If you submit licensees should not continue to carry USAOs, what would you submit the role of licensees should be towards contribution to the goal of US/UA?

The USAF exists and funds contained should be utilised for the purposes intended in section 88 of the ECA – that is for demand side and supply side subsidies. The ECA is specific in that it states that the money in the USAF must be used “exclusively for the payment of subsidies”

Q15.1.7.4 If you submit licensees should continue to carry USAOs, would you submit that such obligations must be adjusted up in view of the relief from contribution into USAF?

To avoid the complications associated with suggested adjustments please see answer to Q 15.1.6. However, there should be some adjustments but the adjustments should be downward on the understanding that USAO's may have both higher initiation costs (CAPEX) and long term operational costs. The Authority should be cognisant of the increase in regulatory costs into the business as that has an effect on various elements of the business, including prices of products and services provided to the consumers.

Q15.1.8 Which concepts or terms used in the ECA that have a bearing on USAOs and/or the USAF must be identified or amended? You are requested to refer to difficulties encountered in implementing such terms and/or concepts, if any?

In terms of Section 88(2) the Authority should define underserved areas.

Q15.1.9 Which method has to be used in defining or amending such terms and or concepts including whether in the ECA itself, by ICASA, USAASA or any other relevant body?

In terms of Section 88(2) the Authority should define underserved areas.

Implementation Issues

Q15.2.1 Would you submit that the current USAOs implementation system needs to be maintained (in the move above towards a new model)? In this regard, you are requested to express your views also on the initial process for the development and determination of the USAOs and the process for the co-ordination and actual rollout of the USAOs.

MTN is of the view, that what is of importance, is the identification of the relevant underserved areas and the coordination of demand-side market driven projects.

Q15.2.2.2 If so are there any areas that need improvement in the in the:

15.2.2.1 Determination of USAOs? Please provide full details.

15.2.2.2 Coordination of USAOs? Please provide full details.

15.2.2.3 Monitoring and Evaluation of USAOs? Please provide full details.

Please see answer above.

Q15.1.3 If not so please identify the short comings and/or problems associated with the current system.

MTN believes that the relevant demand-side driven project have not been identified by USAASA as envisaged in section 90 of the ECA.

Q 15.2.4 As stated in the ECA, should only the ECNS licensees be eligible for the competitive tendering process for US and UA projects?

MTN submits that any licenses contributing to the USAF should be eligible to receive incentives from the fund and should be granted such funds on the basis that they are the successful candidates of the relevant tendering process pursuant to section 90 of the ECA..

Q15.1.4.2 If No:-

(a) Should any other licensees who carry USAO also be considered?
(b) Should this be broadened to include other non licensed qualified contenders as a way of opening up the market further?

Please see answer to Q15.2.4 above.

Policy Issues

Q15.3.1.1 As regards to the recommended model, can it be implemented under the existing provision of the ECA?

Q15.3.1.1 If so please provide Full details.

It is MTN's view that all licensees who contribute to the USAF are eligible to participate in the tendering projects pursuant to section 90 of the ECA.

Q15.3.1.2 If not so, please indicate whether a legislative amendment would be required and identify provisions of the ECA that need to be amended and/or new provisions that need to be introduced.

MTN proposals in this regard do not require any legislative amendments.

Q15.3.2 what should be the focus areas of USAOs in terms of Infrastructure and services?

MTN submits that the focus of the USAOs is the identification of demand-side driven projects by the ICASA and USAASA.

General

Q15.4 Interested parties are requested to provide any information or raise any issues not covered above, that they submit are relevant and need to be taken into account for the purposes of this inquiry.

END