

Advancing affordability to connect the last 50%

A global coalition working to make broadband affordable for all



**A4AI Comments on Proposed
Electronic Communications Amendment Bill**

www.a4ai.org

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What is A4AI?



We are the
world's broadest technology sector alliance
working to
drive down the price of broadband
by
**transforming policy and regulatory
frameworks.**

Public-private collaboration in action with 80 member organisations



USAID
FROM THE AMERICAN PEOPLE



All have endorsed one set of **best practices**

- *grounded on the principles of internet freedom and the fundamental rights of expression, assembly, and association online* -

for making **affordable broadband internet** a reality.

How do we work in member countries?



In each member country, we form a
national multi-stakeholder coalition



civil society



public sector



private sector

to

IDENTIFY KEY BARRIERS TO AFFORDABLE ACCESS

&

DEVISE TAILORED SOLUTIONS TO DRIVE PRICES DOWN

Affordability still a major barrier to access



The high cost to connect is excluding billions from the digital revolution

Over half of the world's population is still offline

At current rates, on track to miss global access target by 20+ years

Just 19 countries meet the “1 for 2” affordability target

1GB for 2% or less of average monthly income

(South Africa does not meet the target)

The proposed amendment to the ECA



- A4AI applauds the South African government for moving to amend the 2005 Electronic Communications Act
- It is important that the proposed amendments are in line with international and regional good practices aimed at improving affordability and internet use for consumers.

A4AI's Comments and Recommendations (1)



On the “Wireless Open Access Network” (WOAN):

- In principle, a good proposal to reduce costs (e.g., by requiring active infrastructure sharing), but we would recommend that similar proposals be put forward to address networks that will not be part of WOAN, including existing mobile networking infrastructure.
 - For example:
 - fiscal incentives to promote greater passive infrastructure sharing among mobile network operators and other ISPs, and
 - a “single window” approach to coordinate all building permits and reduce the need for the involvement of multiple permitting agencies to obtain right of way or establish base stations.

A4AI's Comments and Recommendations (2)



- Amend the 2005 Act to be aligned with the National Integrated ICT Policy White Paper to reduce digital divide and promote infrastructure investment in an inclusive manner.
- Additional good practice that can be further articulated in the Amendment Bill include:
 - a. Establish a national affordability target such as A4AI's proposed "[1 for 2](#)" goal, which was recently adopted by the UN Broadband Commission, where the price of a 1GB mobile prepaid data plan costs less than 2% of average monthly income. **Given the high level of income inequality in South Africa**, the government should go further and include affordability targets for low-income groups in the country.
 - b. Invest in and support the development of public access facilities (including public WiFi solutions), while maintaining adequate [consumer protections](#) on such networks.

A4AI's Comments and Recommendations (3)



- Public access solutions, such as community networks (which we define as community-owned and managed networks that provide internet access to the public) can be a crucial part of the strategy to improve access and affordability among the unconnected.
 - The WOAN presents one such opportunity —community networks, for example, could be given priority or subsidised access to the wholesale network.
 - A precursor is that community networks be considered for licence exemptions to operate as an Electronic Communications Network Service (ECNS) where feasible and after application to the Minister.

A4AI's Comments and Recommendations (4)



- While the amendments regarding spectrum management are an improvement on those currently in place, additional steps would be welcomed.
 - These can include, for example, rules for the utilization of unlicensed spectrum (e.g., TV white spaces) and other emerging technologies.
 - This should be done with the aim of supporting access in rural areas via community networks or similar locally managed initiatives, and can further improve the Bill's goal of supporting Broad-Based Black Economic Empowerment.

A4AI's Comments and Recommendations (5)



- There are several challenges related to women's access to and use of the internet. While the Bill recognizes this fact in its overall goal (which includes “empowerment of women...”), there is no specific mention of how this will be achieved.
- For the Bill to be truly [gender-responsive](#) and ensure that both women and men have the same opportunities to leverage the power of the internet to improve their lives, we recommend a number of steps:

A4AI's Comments and Recommendations (5)



(cont.)

- Specific targets be established for removing the gender gap in access and use in South Africa (this can include progressive targets to be achieved over time).
 - To enable this, it is critical that gender disaggregated data on access and use be collected and, in the case of non-individual data, shared using open data guidelines.
- Protections are in place to protect users online, including measures to prevent the harassment and abuse of women online.
- Ensuring that people, including women and girls, have adequate skills to use and create online products and services; this includes encouraging/incentivizing the creation of content for women.
- Initiatives aimed at improving affordability consider and target women's needs and income barriers, particularly given the wage gap between women and men.

A4AI's Comments and Recommendations (6)

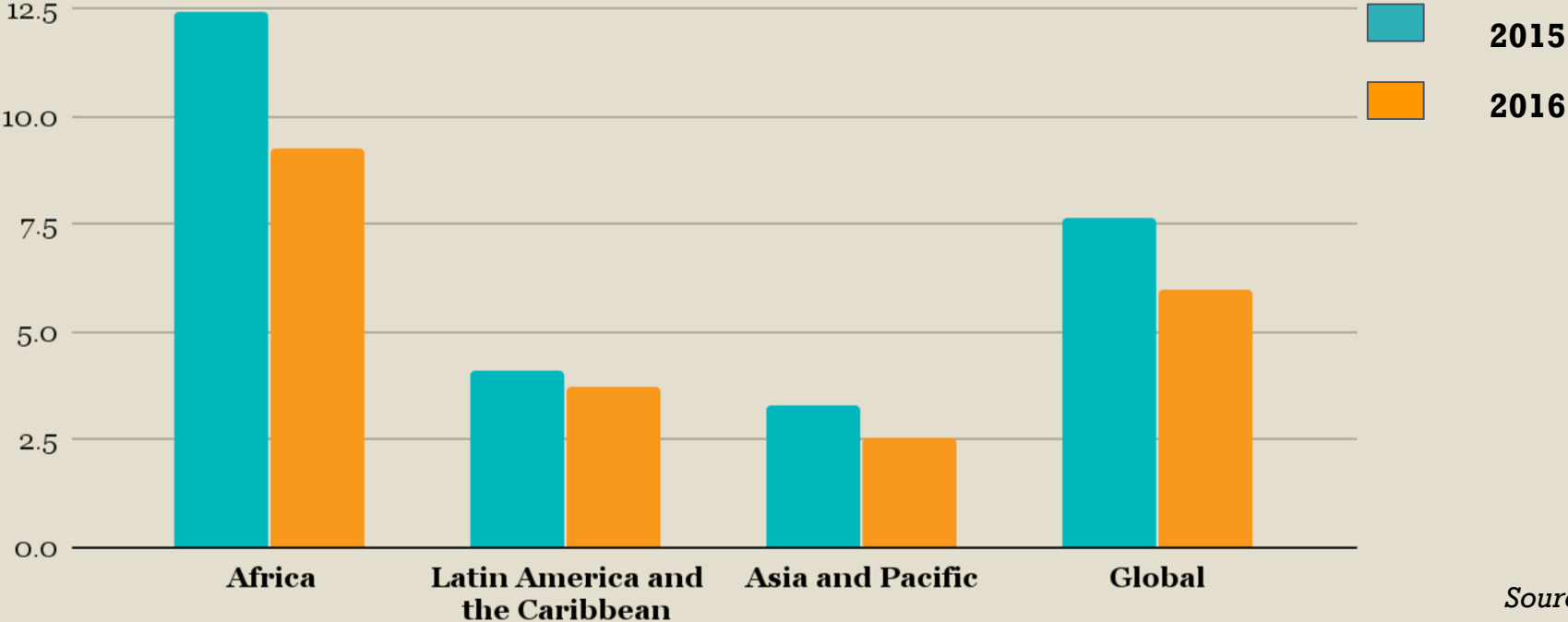


- Other general items to improve overall online experience for all South Africans
 - Research and data collection - should be done annually and include types of mobile data plans (and fixed services) being used.
 - This is important as some mobile data plans offer access to limited content and not the entire internet (e.g., [service specific plans](#)), thereby limiting the user's experience online.
 - Pricing Transparency - improve the ability of subscribers to track their data usage.
 - Develop plan with MNOs and other ISPs to enable better disclosure on how consumer behavior is monitored and used by the companies.

Slow progress means billions are still excluded



Average price of a 1GB mobile broadband plan as a % of GNI per capita, by region



Source: A4AI



Thank you!



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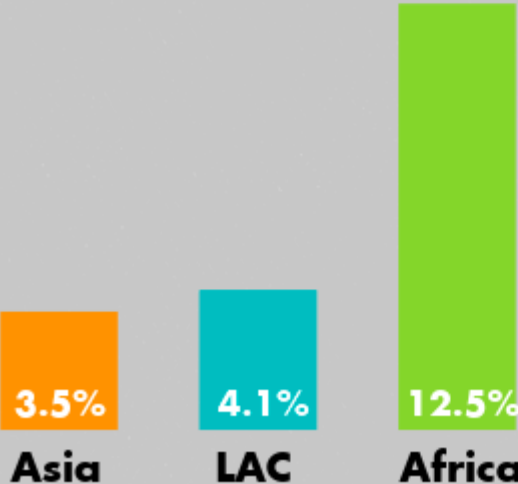
Direct support & action: Where we work



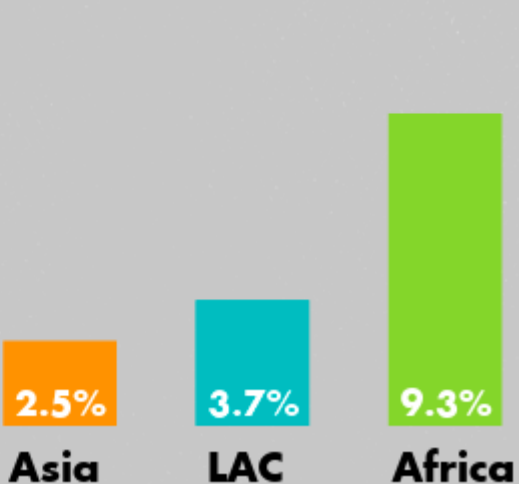
Mobile Pricing Data

We looked at the most affordable 1GB mobile data plans across 59 low-and middle income countries

Price as a percent of average income (2015)



Price as a percent of average income (2016)



Conducting robust original research to underpin evidence-based policy



Annual Affordability Report

Latest edition released
February 2017;
Pricing update in
November 2017

Case studies

Ghana, Nigeria,
Cameroon, Peru,
Brazil, Dominican
Republic,
Myanmar,
Bangladesh

Thematic briefings

Universal Access
& Service Funds;
Zero-rating &
other mobile
data plans

What action must we take to make universal access a reality?



Employ Public Access Solutions to Close the Digital Divide

Critical to reach groups that cannot pay for regular internet use.

Foster Market Competition through Smart Policy

Competitive markets provide foundation for growth, innovation & affordable access.

Implement Innovative Uses of Spectrum

Clear strategies to ensure availability of sufficient spectrum on a timely basis.

What action must we take to make universal access a reality?



Promote Infrastructure and Resource Sharing

Provides operators the best option to reduce the cost of service provision.

Make Effective Use of Universal Service and Access Funds

Active, transparent & efficiently managed funds can support broadband strategies & targets.

Turn Effective Broadband Planning Into Effective Implementation

Plans that set clear, time-bound and measurable targets are best of all.

How is A4AI working to tackle these gaps?



Encouraging the adoption of ambitious affordability targets to drive down prices & increase access

Working with national coalitions & stakeholders on the ground to develop policies needed to improve affordability

Improving collection of gender- and poverty-disaggregated data to track progress

Advocating for expanded public access initiatives

Designing gender-responsive policy

Internet for all by 2020?



In September 2015, world leaders agreed on a new global goal:

Affordable, universal internet access in the world's least developed countries by 2020

On current trends, the world will miss this goal by 22 years.

