

30 January 2020

To: Mr. Davis Moshweunyane  
Email: [dmoshweunyane@icasa.org](mailto:dmoshweunyane@icasa.org)  
**Independent Communication Authority of South Africa (ICASA)**  
**350 Witch-Hazel Ave**  
**Eco-Park Estate**  
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**0144**

**RE: Response by Bowline Security – Information Memorandum on the licensing of high demand spectrum.**

## **Introduction**

Would like to take this opportunity to personally thank ICASA for this opportunity to respond to ICASA's Information Memorandum on the licensing of High Demand Spectrum  
We are a 100% Black owned and managed business focussed on providing Cyber Security solutions to the market.

## **Background**

We think an economically viable 100% Black owned Wireless Open Access Network (WOAN) is required for the following reasons:

- Broadband Access to all of South Africa
- Affordable Broadband is a basic need to participate in the 4<sup>th</sup> Industrial Revolution
- Economic analysis of South African mobile broadband market (refer to recent Competition Authority findings on data pricing)  
Need for increased Black ownership and competitive power in the industry
- Challenges with current wholesale regime
- Alternative wholesaler for approximately four hundred ECNS licensees

## Specific comments/questions

- What happened to the Liquid Telecom spectrum in the 800 MHz band? Is this part of the auction?
- Link the timing of the licensing of WOAN and award of High Demand spectrum to other licensees.
- When will digital migration be completed and the 700 MHz and 800 MHz spectrum become available?
- Introduce a Universal Service Obligation on existing and new licensees to provide a Community Data Service at subsidised prices, similar to the previous Community Service Telephones in underserved areas
- We agree with the proposal to require rural coverage before licensees are allowed to use the spectrum in urban areas
- The WOAN Company should remain 100% Black owned for at least 20 years after receipt of the License and Spectrum.

## Conclusion

### Our Requests are as follows:

1. The WOAN must be 100% Black Owned.
  2. All High demand Spectrum must go to the WOAN.
  3. All other spectrum that is available must be made available to the WOAN first.
  4. We do not have a site of the ITA even though it is mentioned in the IM.
5. We want access to the draft ITA to make comments before final issuing.
6. There must be independent assurances put in place to ensure the success of the WOAN

Sincerely,

Carl Heinz Uys - CEO

