



the dpsa

Department:
Public Service and Administration
REPUBLIC OF SOUTH AFRICA

Private Bag X916, PRETORIA, 0001 Tel: (012) 336 1000, Fax (012) 326 7802
Private Bag X9148, Cape Town, 8000. Tel: (021) 467 5120, Fax (021) 465 5484

Mr. Davis Kgosimolao Moshweunyane
The Independent Communications Authority of South Africa (ICASA)
350 Witch-Hazel Park
Eco Park
Centurion
0144

Dear Mr. Moshweunyane

**WRITTEN REPRESENTATIONS IN RESPONSE TO NOTICE ON THE LICENSING PROCESS
FOR INTERNATIONAL MOBILE TELECOMMUNICATIONS (IMT) SPECTRUM**

The notice on the licensing process for International Mobile Telecommunications (IMT) spectrum published in the Government Gazette No. 42820 on the 1st of November 2019 has reference.

As a matter of priority, the Department of Public Service and Administration (DPSA) we would like to compliment and congratulate the Independent Communications Authority of South Africa (ICASA) for this progressive development aimed at ensuring citizens equal access to broadband irrespective of their geographic placement.

Before providing the actual comments, it might be useful for ICASA to appreciate that the Minister for Public Service and Administration is responsible for the establishing norms and standards relating to:

- i. Information Management in the public service;
- ii. Electronic government (e-Government);
- iii. Transformation, reform, innovation and any other matter to improve the effectiveness and efficiency of the public service and its service delivery to the public;

The development of these and other norms as well as standards is provided for in terms of section 3 (1) (f), (g) and (i) of the Public Service Act No. 103 of 1994, as amended. These norms and standards, when implemented, allow government to improve internal operations as well as service delivery to the citizens leveraging information communication technology. It is therefore within the context of ensuring improved service delivery to the citizens leveraging this licensing process that the DPSA submit these comments.

As a result and in line with section 6.5.2 of the notice, we would like to make the following written representations:

Staatsdiens en Administrasie . Ditirelo tsa Puso le Tsamaiso . Ditshebeliso tsa Mmuso le Tsamaiso . uMnyango wemiSebenzi kaHulumeni nokuPhata

Muhasho wa Tshumelo ya Muvuso na Vhulanguli . Kgoro ya ¹Ditirelo tsa Mmušo . Ndzawulo ya Vutirela-Mfumo na Valawuri

LiTiko le Tebasebenti baHulumende nekuPhatsa . ISebe leNkonzo kaRhulumente noLawulo . UmNyango wemiSebenzi kaRhulumente nokuPhata

1. ICASA need to ensure the establishment of the Monitoring and Evaluation unit or function with the intention to track progress with respect to adherence to, and or implementation of the social obligations (licence conditions) that will be imposed in respect of this licensing process. The DPISA may play a role in assisting ICASA in respect of the monitoring process depending on the available capacity combined with the nature of the obligations.
2. The achievement of National Development Plan goals and objectives relies on sustainable network infrastructure as a foundation to deliver government services to citizens in both urban and rural areas. Therefore, the outcome of this licensing process must ensure that the successful bidders/ licensees rollout the ICT/ telecommunications network starting (priority) at the edges of the country (outskirts) targeting historically disadvantaged groups. This social obligation should improve network coverage in rural areas thus ensuring that e-government and smart city services are accessible to all citizens equitably.
3. Another outcome of this licensing process must be the zero-rating of interconnection between government departments. ICASA would need to ensure that this process achieves this outcome.
4. The technology manufacturing industry (hardware in the main) is expected to be one of the major beneficiaries of the allocation of the spectrum in terms of this process. The outcome of the licensing process should therefore be the development of the local manufacturing industry for technology hardware in particular.
5. Another outcome required from this licensing process is the zero rating of all services running under the South African government domain name space (.gov.za).
6. In addition, there are sector-specific proposals that are specified below:

SECTOR	PROPOSAL
Education	<ul style="list-style-type: none"> - All government schools must be connected free of charge (priority should be non-fee paying schools) - Successful bidders/ licensees must, at no cost, avail their digital platforms for use to provide online/ digital education content (i.e. e-education at no costs, this may include all academic activities such as research, etc.)
Health	<ul style="list-style-type: none"> - All government health facilities must be connected free of charge with the view to achieve relevant goals of the

	National Health Insurance programme/ initiative.
Agriculture	- All registered emerging/ small farms of the previously disadvantaged people must be connected at no cost. This would be to ensure that they access the required information to improve production thus ensuring food security but also have ease of access to markets to sell their produce.
Electricity (Power Generation or Alternative Power Generation)	- Successful bidders/ licensees must ensure that they self-provide the alternative source of energy to ensure continuous availability of their networks and services in line with their uptime commitments.
Security	- A portion of the available spectrum must be reserved for the Security Cluster to ensure secure communication amongst the cluster members.

While attempts have been made to ensure clarity of these proposals, it is important to emphasize that the above are the proposed social obligations (licence obligations) which successful bidders/ licence ought to comply with as part of their licence conditions.

The DPSA can make oral presentation of these proposed social obligations if required. For any enquiries regarding these proposals contact Mr. Mandla Ngcobo at 012 336 1070 or mandla.ngcobo@dpsa.gov.za

Thank you for the opportunity provided.

Yours Sincerely,



Ms. Linda Dlodla

Acting Director-General

Date: 28/01/2020