



Reg no. 2015/109244/07

Services offered are:

- ICT Infrastructure services
- Mobile Network Architecture Design
- Project Management
- Risk Assessment
- Information Security Consulting
- Compliance Assessments
- Your business's Virtual Information Security Officer

22 Francke Street
Kuilsriver
Cape Town

0662009205
info@fccps.co.za

January 27, 2020

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

FCC Projects and Services Pty Ltd Reg No. 2015/109244/07 would like to take this opportunity to personally thank ICASA for this special 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 the design, implementation and the continuous evolution of Mobile Networks and services for Africa. We have experience in the design of Low Frequency Spectrum Mobile Networks and the accompanying services associated to various Mobil Operators in 7 African markets. All the Operator networks and services we've designed have Cyber Security, High 99,998% Availability and Quality of Service at it's CORE.

Our C-Level executive team is made up of CEO, CTO, Chief Strategist, Customer Experience Exec and recently added a Business Development Officer and we all have a vision of Quality Connectivity for ALL Africans.

Background on why an economically viable 100% Black owned WOAN is required

- Broadband Access to all of South Africa
- Affordable Broadband is a basic need to participate in the 4th 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
- Why should the WOAN company not be 100% Black owned?
- The WOAN company should hold all available High demand Spectrum and operators can approach the WOAN Co. for purchase.
- All Low High demand Spectrum must be allocated to the WOAN Company.
- Describe what support structures and assurances would be available to the WOAN company? If no assurances, are you not setting up the WOAN company to fail against the White Monopoly that exist.
- The WOAN Company should remain 100% Black owned for at least 20 years after receipt of the License and Spectrum.

In Conclusion our key demands are the following:

1. That 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 site of the ITA even though it is mentioned in the IM.
5. We want access to the draft ITA to make comment before final issuing.
6. There are independent assurances put in place to ensure the success of the WOAN

Sincerely,
Damien Francis
CEO – FCCPS