



Reg. No. 2009/009533/07

36 Holland Avenue

Blairgowrie, 2194

Tel.: 011 326 3823

Fax : 086 666 3867

Web: www.juicetel.com

Email: enquiries@juicetel.com

31 January 2020

Response to ICASA Information Memorandum on the Licensing of High Demand Spectrum

We would like to thank ICASA for the opportunity to respond to the Information Memorandum.

We believe that being an SME at this stage of the Information Age, given the international climate of convergence in services, data, intel and communication; offers our team of experts the flexibility to innovatively flow with the changes resulting in innovative infrastructure solution design, telecommunications network design & rollout, National ICT Policy Understanding, IT Infrastructure, Systems and Application development, integration, migration and implementation. It is for this reason that we believe that a change needs to happen in the allocation and use of spectrum to further allow broadband access to our people in order for them to create their ecosystems of information in a manner that allows economic, social and growth objectives for each individual to become a reality and not just a dream.

JuiceTel (PTY) Ltd is a level 1 BBBEE company whose shareholding and management is 100% black and has 50% black woman ownership. JuiceTel (PTY) Ltd was formed to venture into opportunities that involve telecommunications solutions, support and maintenance. It was also involved in a bid to develop the first MVNE in South Africa.

We believe that the WOAN is essential to break decades of monopoly of spectrum, infrastructure and services by incumbent providers. We need access for people to chart their paths in life and prepare coming generations for theirs. Our country has many problems that need to be addressed and access to information, education, resources, work and the world must be at their fingertips to allow them to grow at their pace.

Directors:

Angus Lindsay McCloed, Anthea McCloed

The WOAN is important for several reasons but not limited to the following:

- **Data prices are still keeping the majority of our population marginalized. Bodies like the Competition Commission and ICASA have made this very clear.**
- **There is little and controlled black participation in the industry from build to ownership to procurement, etc.**
- **There is also very little been done for the plight of SMMEs and more specifically Black SMMEs who are continually marginalized in access and procurement**
- **There are licence holders who could become active MNVO/ISP/resellers/Specialized Service providers who need an affordable way to offer their services.**
- **The current wholesale model needs to be challenged by the establishment of the WOAN.**

Our comment on the IM is as follows but not limited to the following:

- **That the WOAN must be 100% Black Owned.**
- **All High Demand Spectrum must go to the WOAN. The MNO can procure spectrum from the WOAN.**
- **All other spectrum that is available must be made available to the WOAN first.**
- **As incumbents have had 25 years to fulfil their obligations and have failed dismally, we propose that the WOAN get favourable licence and spectrum terms for 25 years as partly suggested in the IM.**
- **We do not have site of the ITA even though it is mentioned in the IM.**
- **We want access to the draft ITA to make comment before final issuing it.**
- **Need for equitable treatment of licensees with respect to amount of low, mid and high band spectrum.**
- **The allocations that do go to incumbents whether through the WOAN or direct from ICASA must be subjected to 40% black SMME participation for but not limited to all services provided by the incumbents.**

Additional questions/comment on the IM is as follows but not limited to the following:

- **What happened to the Liquid Telecom spectrum in the 800 MHz band? Will it be part of the allocation?**
- **The establishment of the WOAN comes at a time of the move to award of High Demand spectrum to other licensees. The impact of the WOAN been licenced will chart a more dynamic and equitable distribution of spectrum to new and existing black enterprises.**
- **When will digital migration be completed and the 700 MHz and 800 MHz spectrum become available?**

- Introduce a stricter Universal Service Obligation on existing and new licensees to provide a Community Data Service at subsidised prices in underserved areas with potential partnership with the WOAN to ensure it happens.
- We agree with the proposal to require rural coverage before licensees are allowed to use the spectrum in urban areas. But would suggest that it be done as a 70/30 split in favour of rural in order to promote sustainability of the WOAN
- What makes the universal service obligations for the incumbent any different now as they have not done enough to assist in providing access to all? The opportunity in licensing the WOAN is central to changing this state of affairs.
- How will the sharing of infrastructure and spectrum be dealt with as we believe incumbents will be hesitant and even frustrate efforts to share infrastructure as well as sharing spectrum that they do not use.

Our highlighted comments above are critical requirements that must be satisfied as a priority.

We are willing to present our views if and when required to do so.

Kind regards



Angus McCloed
MD
083 963 1309