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The Independent Communications Authority
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31 January 2020

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Our Comments on

Noticing on the Licensing Process for International Mobile Telecommunications (“IMT”) Spectrum, Inviting Comments in Respect of the Provisioning of Mobile Broadband Wireless Open Access Services for Urban and Rural Areas Using the Complementary Bands IMT700, IMT800, IMT2300, IMT 2600 and IMT3500

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Dear Sir

As South Africa and Germany based company, since 1988 we are providing global consulting services in the IT and telecommunications sector to governments, telecommunications operators and private sector companies, also on behalf of European Union and Asian Development Bank. For details please refer to our website <http://www.sec-sommer.com>

Our comments to above subject are as follows:

- 1) Private sector companies will need 5G spectrum for corporate use (“5G for Industry”), e.g. for Fourth Industry Revolution (4IR) / Industry 4.0 technologies implementation. These spectrum requirements need to be considered in addition to the spectrum requirements of the licensed telecommunications operators. Respective policies for corporate (private) use need to be in place. A “5G for Industry” use case is Bosch Group which recently applied for

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corporate 5G spectrum in Germany¹. The German regulatory authority “Bundesnetzagentur”, which you have also mentioned in chapter 6.2.1 of your notice, has set aside the frequency band from 3,7GHz to 3,8GHz for this purpose. Frequencies will be allocated according to demand from at least 10MHz to a maximum of 100MHz, with preference given to Industry 4.0 or agricultural and forestry applications. In South Africa for example the mining industry will probably have similar use cases for “smart mining”.

- 2) Based on own global experience we recommend to reconsider the proposed wholesale Wireless Open Access Network (WOAN) structure. WOAN implementation and sustainable operation and maintenance is very complex, the targeted benefits are in question. There is a high risk that WOAN fails or at least that there are major delays, which will have negative impact on international competitiveness and employment of the country. Furthermore, WOAN will limit rare spectrum availability for telecommunications operators and private sector companies further. Please also refer to the GSMA report highlighting the negative experience made with similar structures in other countries².

Recommendation: long-sighted and professional spectrum management is required; clean-up required spectrum bands for reuse; leave network planning, operation and maintenance to the private sector.

- 3) To reduce telecommunications pricing, we recommend revising and implementing infrastructure sharing and multi-sector infrastructure (power grid, railways, public roads, etc.) sharing policies, and make applications, approval processes and fees for constructions (conduits for fiber cables, telecom towers, base station on buildings, telecom facilities) clearer and more predictable (“Right of Way”). About 70-80% of telecommunications costs are infrastructure related costs.

For any questions and detailed discussions please do not hesitate to contact me.

Yours Sincerely

Andreas Sommer

¹ <https://www.bosch-presse.de/pressportal/de/en/bosch-applies-for-local-5g-licenses-203328.html>

² <https://www.gsma.com/spectrum/resources/woan-report/>