

Independent Communication Authority of South Africa (ICASA)
350 Witch-Hazel Ave
Eco-Park Estate
Centurion
0144

RE: ICASA INFORMATION MEMORANDUM ON THE LICENSING OF HIGH DEMAND SPECTRUM

Purpose: Sun n Shield 84 Technologies (pty) Ltd – 2013/003813/07 response to ICASA Information Memorandum on the licensing of High Demand Spectrum

Sun n Shield 84 Technologies is a BWO youth owned company that functions in the broadband infrastructure company. We would like to thank appreciate the opportunity to comment on the Information Memorandum (IM)

- Background on why an economically viable WOAN is required
 - 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 control of the industry
 - Challenges with current wholesale regime
 - Alternative wholesaler for approximately four hundred ECNS licensees
- Need for equitable treatment of licensees with respect to amount of low, mid and high band spectrum.
- 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
 - Options 3 or 4 would be preferable

- Conclusion

Basic principles are:

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.
- All above MUST be completed by COB 28th January 2020.

Best regards
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