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**Tuse Applications (PTY) LTD.** response to ICASA Information Memorandum on the licensing of High Demand Spectrum

Thanks to ICASA for the opportunity to provide comments in response to the Information Memorandum (IM)

- General comments

- Details on who we are:

Tuse is a mesh networking company started in 2015 by Sabelo Sibanda and Thulisile Volwana in 2015. An alumni of the Founders Space Accelerator in San Francisco, Tuse raised a pre-seed round through a Draper Venture Capital fund and is a Global ITU Award winner.

- Background on why an economically viable WOAN is required
  - Affordable Broadband is a basic need to participate in the 4<sup>th</sup> Industrial Revolution
  - The broadband market is emerging from many years of slow growth exacerbated by an expensive operating environment created by Telkom's market dominance and its control of access to international bandwidth. Although wireless broadband services have carved out market share from existing DSL offerings, the sector is dominated by mobile networks and despite a growing fixed-line footprint the government's plan to provide national broadband coverage is largely based on mobile technologies
- There's a need for equitable treatment of licensees with respect to amount of low, mid and high band spectrum.

- Specific comments/questions

- 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

- Conclusion

- Our expectation from the IM process is that the WOAN must be 100% Black Owned & remain that way for a period of 5 years, all High demand Spectrum must go to the WOAN and all other spectrum that is available must be made available to the WOAN first.