

January 27th , 2020

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UniqueNET Resource (PTY) Ltd Registration No. 2016/048544/07 would like to response to ICASA Information Memorandum on the licensing of High Demand Spectrum.

UniqueNET Resource (PTY) Ltd would humbly like to take this opportunity to 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 focusing on the ICT Infrastructure, Enterprise & Mobile Network designs, Implementations, Installations and continuous support.

Our Company structure is made up of Managing Director, Sales & Marketing Manager & a team of Engineers. We thus, however, have a vision to expand the team in the future by adding more members to the team as the company grows.

Background on why an economically viable 100% Black owned 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
- The WOAN Company should remain 100% Black owned for at least 20 years after receipt of the License and Spectrum.

Conclusion - Our key demands are as follows :

1. That the WOAN must be 100% Black Owned not BEE.
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 should/must be independent assurances put in place to ensure the success of the WOAN

Thank you in advance

Kind regards
Chaka Tekane