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FROM: POSTNET NICOLWAY  
ACC NO: 12575

FROM: **JNB** TO: **PRY**

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**ONC**

WEIGHT:  
1 KG

PIECES:  
1

DELIVERY ADDRESS:  
ICASA  
350 WITCH -hazel avenue  
ECO POINT PARK

SPECIAL INSTRUCTIONS:

ICASA RECEIVED  
2020-01-30  
REGISTRY

CENTURION  
CENTURION  
0157  
ICASA

INSURANCE REQUIRED: **NO**

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CONTENTS:  
DOCUMENT

SECURITY PACK NUMBER:  
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Date: 29-January-2020

WHO WARRANTS THAT HE/SHE IS AUTHORISED TO ACT ON BEHALF OF THE CUSTOMER AND THAT THE CUSTOMER AGREES TO THE STANDARD TERMS AND CONDITIONS OF COURIERIT SA(PTY) LTD A COPY OF WHICH IS AVAILABLE ON REQUEST.

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**PROOF OF DELIVERY**

NAME DATE

SIGNATURE TIME

CONFIRMED SECURITY PACK NUMBER AND RECEIVED  
IN GOOD ORDER AND CONDITION



ICASA  
350 Witch-Hazel Avenue  
Eco Point Office Park  
Centurion  
0144

28 January 2020

**RE: Vac Digital response to ICASA Information Memorandum on the licensing of High Demand Spectrum**

Vac Digital would like to hereby thank ICASA for the opportunity to provide comments in response to the Information Memorandum on the licencing of High Demand Spectrum.

Vac Digital is a new Level 1 B-BBEE SMME focused on provided Unified Collaboration solutions (Audio & Video) and services to the SMME market. The company focuses on enabling organisations to communicate and collaborate internally and externally in a more efficient way.

Vac Digital is part of the ICT SMME Chamber who have proactively created a consortium with the specific objective of becoming a WOAN service provider. This consortium has registered a company which will be the respondent when the WOAN RFX is released. The company has a board which is representative of the SMMEs who are registered with the ICT SMME Chamber.

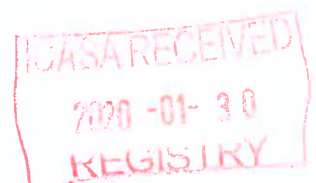
Affordable broadband is now a basic need for digitisation let alone an absolute must for the 4<sup>th</sup> Industrial Revolution. Even with the increased penetration of smartphone usage, mobile subscriptions and data subscriptions recorded in ICASAs report on the State of ICT Sector in SA 2019, South Africa is nowhere near digitisation required for a country of our geographical, educational, developmental and economical requirements.

Currently the industry is monopolized by large multinational service providers who provide infrastructure to SMMEs at retail prices. The large service providers also compete with SMMEs for managed services e.g. audio, video, security, collaboration, data management services, etc. Being dependent for infrastructure for some of these services it is impossible for SMMEs to compete with these service providers in any market segment including the SMME market – the Cost of Sale is too high for a SMME.

This is an opportunity to radically transform this industry. This transformation take the form of 1) increasing the number of black owned businesses who benefit from a WOAN company 2) providing the opportunity for these black owned SMMEs to contribute to the economy both in terms of their own revenues and profit but also in terms of employment, skills development, educational impact on youth, etc 3) enabling these SMMEs to contribute to the ever increasing demands for digitisation e.g. imagine a black farmer wanting training / guidance on crop choice in a specific season and how to go about introducing a new crop to their farm and they can access this training either via an App or via YouTube, watch a video and gain immense knowledge from around the world giving them the best opportunity to succeed!

As a SMME, Vac Digital is does want to depend 'hand outs' from the incumbent large service providers – in order for them to meet their 30% target. Vac Digital would like to have the ability to engage with likeminded, similar sized organisations in a consortium in which we seek assistance from other SMMEs and in turn provide support and assistance to them – a WOAN company is ideally suited to this growth for SMMEs in this sector.

There are approximately 400 ECNS licences to be award – **it is time for change!** There needs to be an alternate wholesale provider to manage this environment. It is incumbent on ICASA to assist in driving change in this industry – that is our ask.



It is imperative for the future of the industry that there is equitable treatment of every licensee with regards to the amount of low, mid and high band spectrum. As long as there is a lack of equity, the industry will continue to be monopolised.

The market also needs to know the following:

- If the 800MHz band allocated to Liquid Telecom going to be part of the auction?
- Is the licencing of a WOAN provider and the awarding of High Demand Spectrum to other licensees going to be aligned?
- When will digital migration be completed?
- When will the 700MHz and 800MHz spectrum become available?

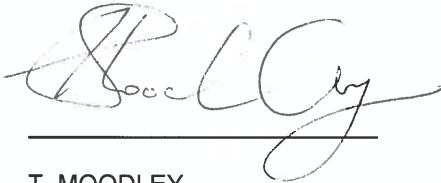
Vac Digital agrees with the proposal requiring rural coverage before licensees are allowed to use the spectrum in urban areas.

Options 3 or 4 would be preferable

In conclusion, Vac Digital would like to iterate our request for an inclusion of SMMEs as a new black owned WOAN wholesale provider to enable SMMEs to build, grow, scale and transform this industry and to contribute to the economy through employment, skills development, education and service delivery.

Once again, thank you for the providing the opportunity for Vac Digital to comment

Kind regards

A handwritten signature in black ink, appearing to read "T. Moodley", written over a horizontal line.

T. MOODLEY