

28 January 2020

The Independent Communications Authority of South Africa  
350 Witch-Hazel Avenue  
Eco Point Office Park  
Centurion  
Gauteng

**RE: ZAVUNA Technologies (Pty) Ltd** response to ICASA Information Memorandum on the licensing of High Demand Spectrum

Dear Mr Moshweunyane

Thank you for the opportunity to provide comments in response to the Information Memorandum (IM).

ZAVUNA Technologies is an SMME 100% black owned in the ICT sector providing Project and Telecoms Engineering Services. It is our view that the WOAN must be 100% black owned which will truly lead to the real emancipation of black people in the country and contribute meaningfully in the economy.

The WOAN will be rolling out a state-of-the-art network with an architecture based on the 3GPP technology standard. The envisaged technologies are 4G, 5G and beyond. A sustainable true high speed radio access (4G/5G) network require high channel bandwidths in order to provide the high download speeds in excess of 500Mbps (LTE-A, 3GPP Release 10) with peak rates up to 20Gbps (5G, 3GPP Release 15). The splitting of the HD Spectrum into multiple lots will not make WOAN viable. The current spectrum (700/800 and 2600) is designed for 4G and does not consider evolution to 5G. It will not even meet LTE-A. It is in this basis that that we are proposing the following reasons.

For the WOAN to be successful and sustainable, all the High demand spectrum must be assigned to. It is our view that the WOAN must get first preference when it comes to any other available spectrum. All this will ensure that the WOAN is attractive and commercially viable. This will stimulate investment and technological advancement. It is very critical that any assignment of HD spectrum to any other entity other than WOAN should only be only be assigned when the WOAN is functional and profitable.

We are also proposing that the draft ITA should be made available for comment before the final release. We are prepared to do a presentation to support our submission.

Kind Regards

Samkelo Zake



Chief Executive Officer