



MTN Submission

**Notice Regarding the Information Memorandum on Licensing of Spectrum in
the IMT700, IMT800, IMT2600 and IMT3500 Bands**

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Table of Contents

Introduction.....	3
Section A – General Comments.....	4
<i>Publication of the draft ITA for comments.....</i>	4
<i>Proposed timelines and relationship with the WOAN ITA.....</i>	4
<i>Issues raised in MTN litigation.....</i>	5
<i>Well-meaning consultative process</i>	5
<i>Appointment of auctioneer, mock auction and bidding rules.....</i>	5
Section B – Competition Matters	6
<i>Competition Assessment</i>	6
Section C – Sub-1 GHz (IMT 700 and IMT800) Radio Frequency Spectrum.....	6
<i>Timing around the availability of the IMT700 and IMT800 spectrum bands</i>	6
Section D – Opt-In-Round	7
<i>No need for Opt-In-Round</i>	7
Section E – Spectrum Consideration for Calculating the Spectrum Caps.....	9
<i>Forward-Looking Approach in Spectrum Licensing</i>	9
Section F – Categorization of Tier 1 and Tier 2	11
<i>Categorisation of Tier 1 and Tier 2 on the basis of retail market share in municipalities is irrational and unreasonable.....</i>	11
Section G – Rollout Obligations.....	12
<i>Reasonable Roll-Out Obligation</i>	12
Section H – IMT 3500MHz Band.....	12
<i>Level playing field in the Assignment of 3500MHz Band.....</i>	12
Section I – Report to the Minister on Spectrum Requirements for 5G.....	13
Section J – Spectrum Requirement for WOAN	14
<i>Spectrum Set-Aside</i>	14
Section K – Specific Questions for Clarification.....	14
Section L – Conclusion	16
Annexure A – RBB Economist Report in Response to the Authority's Competition Assessment	17

Introduction

On the 1st of October 2021, the Independent Communications Authority of South Africa (“the Authority”), published a notice regarding the Information Memorandum (“IM”) on the Licensing of Spectrum in the IMT700, IMT800, IMT2600 and IMT3500 Bands pursuant to a court order issued by the North Gauteng High Court¹. The purpose of the notice is to advise the public on the process that the Authority intends to follow in respect of the licensing of international mobile telecommunications for the provision of mobile broadband wireless access services for urban and rural areas using the complementary bands, IMT700, IMT800, IMT2600 and IMT3500.

MTN welcomes the publication of the IM pursuant to the court order, inter alia, reviewing and setting aside the IMT ITA published on the 2nd of October 2020². The ITA has been sent back to the Authority for reconsideration. It is of utmost importance that the Authority addresses the issues which led to ITA litigation and issues raised during the litigation process. MTN reiterates its view raised in the previous 2020 ITA consultation process that the Authority should publish the draft ITA for public comment. We note with concern that the Authority’s plans for the expedited licensing of high demand spectrum published via a media statement dated 01 October 2021 omits the publication of the draft ITA for public comment. This is a grave concern, and MTN urges the Authority to reconsider its decision in this regard to avoid past mistakes.

MTN hopes that these consultation processes will lead to a balanced and fair Invitation to Apply (“ITA”) which will be inclusive and take into account the current market competitive dynamics. The South African mobile communications sector is yet to emerge from “spectrum crunch” and MTN believes that the expedited licensing as outlined by the Authority is critical in putting to an end this trajectory and place South Africa on par with the rest of the world with regard to the amount of spectrum licensed for use and to cater for an increase in demand for data.

MTN’s submission is set out in Section A – Section L and Annexure A (RBB Economist Report) as outlined in the Table of Contents.

¹ Case number: 2020/66778

² Government Gazette No. 43768

Section A – General Comments

Publication of the draft ITA for comments

1. Although MTN is in support of the expediated spectrum licensing process, it is imperative that due process be followed, to avoid more delays and challenges. The key activities set out in paragraph 12 in the IM states that the IM is open for public consultation and interested parties will have two opportunities to make representations on the draft IM on the 2nd of November 2021 and then again by the 29th of November 2021. It is not clear why the Authority intends to conduct two consultation processes on the IM but has chosen not to publish a draft IMT ITA for public consultation. Releasing a draft ITA is critical to prevent surprises or interpretative issues in the final ITA which parties have not previously seen, nor had an opportunity to comment on. This may expose the Authority to litigation and further delays in the release of high demand spectrum, which the industry and South Africa cannot afford. This was one of the critical failures of the IMT ITA issued in 2020, where the Authority failed to consult on the draft ITA despite numerous stakeholders calling for such consultation and seeking clarification. By way of an example, the stakeholders saw rules related to Opt-In-Round, Tier 1 and Tier 2 categorization, Competition Assessment, etc for the first time when the final ITA was published. This resulted in litigation which has delayed the licensing process by at least a year. Had the Authority published a draft ITA and consulted on these issues, the process may have been completed as planned. MTN implores the Authority to publish a draft IMT ITA for comments. Should the Authority remain inflexible around its timeline to allow for such consultation, MTN proposes that the Authority uses the slot earmarked for the second IM to publish a draft ITA for comment as there is little to be derived in publishing an IM for the second time whilst the stakeholders have no insight on the contents of the final ITA. MTN also notes the explanations given by the Authority during the workshop on the 15 of October regarding the lack of publication of a draft ITA. We submit that there is no legal predicament which prohibits the Authority from publishing a draft ITA for comments.

Proposed timelines and relationship with the WOAN ITA

2. The proposed, accelerated timescales for this ITA process and the more relaxed timescales for the new WOAN ITA mean applications to this ITA (due 31 January 2022) will have to be made without having had sight of the WOAN ITA (due to be published on 14th February 2022), or attending the proposed Workshops on the WOAN ITA (due 15 March 2022) to understand how the WOAN will be licensed and operate. Given certain obligations in the previous ITA pertained to the WOAN (see “12.4. Incentives to the WOAN”), these out-of-synch timelines create additional uncertainty in the ITA. It will be impossible for the applicants to properly value the spectrum, and its associated obligations without understanding the license

conditions and operation of the WOAN, from which they may have to uptake up to 30% of capacity. MTN urges the Authority to revise its timelines so sufficient visibility of the WOAN is available to ITA would-be applicants.

Issues raised in MTN litigation

3. The IM currently fails to address key issues in the MTN High Court Application during the litigation process, which to a large extent demonstrated the shortcomings of the 2020 ITA. For example, if the Authority continues to use Tier 1 and Tier 2 operator concept, based on market shares in an arbitrary number of geographies. There is no indication in the IM that this will change in the final ITA. In its High Court Application, MTN submitted that this classification was impermissibly vague, arbitrary, and irrational. MTN maintains this position and refers the Authority back to the MTN High Court Application. The difficulty with the Tier 1 and Tier 2 classification is further highlighted in the RBB Economics report commissioned by MTN (see Annexure A). The Authority should expect that unless these concerns are cured, similar challenges might emerge, and this should be avoided.

Well-meaning consultative process

4. Finally, we note that the Authority refused to respond to critical clarification questions in the 2020 ITA process by (i) failing to provide a response, or (ii) referring stakeholders to non-existent documents such as the Competition Assessment which was not circulated with the previous IM for comment. This approach was frustrating to stakeholders and did not assist in expediting the licensing process. A participative process wherein the Authority provides detailed responses to guide the stakeholders is required for this ITA process to be a success. Previous refusals to engage constructively and continuously with stakeholders to clarify issues as they emerge led to significant, and unnecessary uncertainty, and a perception of bias or neglect which has contributed to litigation. In this regard, MTN urges the Authority to have an open and engaging consultation process to ensure the success of the ITA which is now overdue.

Appointment of auctioneer, mock auction and bidding rules

5. Given the accelerated nature of the proposed timescales, MTN urges the Authority to rapidly conclude the appointment of the external and independent Auctioneer who will be overseeing and managing the entire auction process, so clarity emerges early in the process on how the auction will be actually be run, and they can provide early input into the ITA. The IM is also silent on the of availability of detailed auction rules, and the timing of a round of mock auctions.

Section B – Competition Matters

Competition Assessment

6. The IM states that the Authority has assessed the state of competition in the mobile sector as contained in the published Reasons document, with information at its disposal in formulating the ITA. The Authority omits to state that the Competition Assessment was not published for comment in the 2020 ITA consultation process or to provide reasons why there was no consultation. This was a major procedural flaw which led to litigation. Be it as it may, the Authority appears to be relying entirely on a Competition Assessment contained in a Reasons document that accompanied an ITA that has since been reviewed and set-aside by a court order. MTN urges the Authority to carefully consider whether this could raise new procedural issues that may again delay the ITA.

7. In the intervening period between the publication of the Competition Assessment and the setting aside of the 2020 ITA, the Authority also published the Mobile Broadband Services Inquiry (MBSI) findings in March 2021. The Authority is silent about the impact of this MBSI on the Competition Assessment conducted in 2019. MTN believes that the Authority needs to take cognizance of the impact of the MBSI and the current competition dynamics as it relates to data market and the current ITA. Although the high demand spectrum being contested for is on a technology neutral basis, the market which this high demand spectrum will serve is data market which has rapidly evolved from 2019 when the Authority conducted the Competition Assessment to the current competitive dynamics in 2021 characterized by fierce competition among players. It is on this basis that MTN commissioned the services of RBB Economics to consider the current market dynamics and to assess and provide a detailed response to the Authority's Competition Assessment. The RBB Economics report is attached as Annexure A hereto and it is incorporated in this submission.

Section C – Sub-1 GHz (IMT 700 and IMT800) Radio Frequency Spectrum

Timing around the availability of the IMT700 and IMT800 spectrum bands

8. The timing around the availability of the IMT700 and IMT800 spectrum will have a significant impact on capex requirements, spectrum valuations, coverage, and other obligations.

9. The Authority should be transparent about how the uncertainty about the date of availability and usability of these bands can impact the reserve price for the IMT700MHz and IMT800MHz bands considering the uncertainty about the date of availability and usability of these bands. This was not apparent in the 2020 ITA. The explanation provided by the Authority in the workshop on the 15 of October 2021 does not provide sufficient clarity on how the uncertainty of date of availability was considered in the IMT700 and IMT800 evaluation.

10. While (for planning and commercial certainty) MTN would prefer that the sub-1GHz spectrum to be assigned during this ITA process, even if partially available from the outset (for planning and commercial certainty), it is also true that if the issues of digital migration become intractable, withholding unencumbered spectrum (IMT2600MHz and IMT3500MHz) because of sub-1GHz incumbency will would not serve South Africa well. Should it become clear that sub-1GHz availability / or significant litigation threat risk will delay the ITA indefinitely (see. eTV latest court application), then it could make sense to truncate the ITA and let South Africans enjoy the benefits of more capacity / 5G spectrum while the sub-1GHz issues are being resolved.

11. If this is the approach to be finally taken, the WOAN policy would need to be reconsidered, and both ITAs should be significantly altered. For example, sub-1GHz assignment appears to be critical to the wholesale credibility status (see previous ITA MSPs). If no sub-1GHz can be assigned during this stage, design rules rooted in the concept of wholesale credibility (e.g., MSP, Opt-In- Round) should be revisited. Similarly, coverage obligations given the importance of sub-1GHz bands to meet coverage targets cost-effectively, coverage obligations would need to be altered.

Section D – Opt-In-Round

No need for Opt-In-Round

12. MTN noted in previous submissions that the acquisition of 20MHz of spectrum by any of the Tier 2 applicants would meet the objective of “wholesale credibility” as defined in the previous ITA (“achieving MSP 1 or 2”).

Table 1. Impact of a 20MHz sub-1GHz acquisition on Wholesale Credibility

	Telkom	Cell C	Rain	Liquid
SUB 1GHZ	0+20	22+20	0+20	10+20
1800-3500	142	54	54	80
3600-3800	0	0	80	0
MSP MET	MSP1	MSP2	MSP1 ³	MSP 1 & 2

Source: Table 2 of the Competition Assessment, MTN

13. The previous ITA’s cap of 42MHz for sub-1GHz limits MTN’ and Vodacom’s acquisition of sub-1GHz to a maximum of 20MHz each, leaving 60MHz of spectrum to be acquired by other operators shielded from Tier 1, their competition during the ITA. This means 3 so-called “Tier 2” operators could become credible wholesale operators via a 20 MHz sub-1GHz acquisition each, or and in the worst case two such operators if one operator acquired 40MHz (the maximum possible acquisition under the 42MHz cap), and another acquired 20MHz. In other words, a 42MHz sub-1GHz cap alone ensures at least 4 “credible national wholesalers” operators (+ WOAN) can emerge from the auction, and no Opt-In scheme is would be necessary required to meet the stated policy objective.

14. The Opt-In- Round is also riddled with interpretation difficulties which renders the auction process unnecessarily complex. It would be difficult for the Authority to find a balanced approach in interpreting the Opt-In-Scheme which simplifies the auction process. Even the proposed interpretation in the current IM leaves many questions unanswered (for example, the status of 3500MHz in the opt-in round, the inclusion of 3600MHz-3800MHz in the MSP, how will ICASA select the two opt-in winners). As a result, MTN urges the Authority to completely discard the Opt-In Round and allow successful applicants to compete in the auction for their spectrum needs. We have shown above that the Authority can safeguard its policy objectives via a well-designed caps (and associated sub-caps) regime.

³ Post IMT conversion of 3600-3800

Section E – Spectrum Consideration for Calculating the Spectrum Caps

Forward-Looking Approach in Spectrum Licensing

15. Given the scarcity of spectrum and assignment events, MTN believes that it is essential to take a forward-looking view when setting spectrum caps. It is common cause that the 3600-3800MHz band (“3700MHz”) is already being deployed alongside 3500MHz for mass-market 5G application throughout the world⁴. It is also common cause that its IMT status and primary application to mobile will be fully affirmed during WRC-23.
16. In the light of the expected IMT conversion and the enduring nature of the proposed 184MHz cap regime in the previous ITA, MTN cannot see how ICASA can justify the exclusion of Rain’s 3700 MHz spectrum from the caps, thus, it would be hand it over a lasting competitive advantage where Rain could uniquely hold 264MHz IMT spectrum post IMT conversion, when everyone else would be capped at 184MHz.
17. MTN also notes the 1015MHz used as a baseline for post-ITA assignments and derive the 184MHz cap in the previous ITA includes Rain’s 80MHz in the 3600-3800MHz band. It would be inconsistent to set a cap at 18% of a total that includes this the 3700MHz spectrum assignment, but then exclude the 3700MHz from the cap applicable to Rain. See Table 2 below.

Table 2 Total spectrum assignments post ITA, and derivation of the 184MHz cap (MHz)

Existing IMT assignments ⁵	529
3600-3800	80
Spectrum ITA	326
WOAN ITA	80
Total assignments post ITA	1015
c. 18% of total assignments post ITA ⁶	184

⁴ A recent report by the GSMA shows that as Q 2021, 3700MHz was already the second most commonly deployed 5G band globally (after 3500MHz)

⁵ Source: ICASA

⁶ Source: ICASA

18. To the extent that the spectrum for broadband fixed wireless access refers to the spectrum currently assigned in the 3600-3800MHz band ("3700"), MTN submits it should be included in the caps and sub-caps proposed by the Authority. In the alternative, MTN suggests such spectrum should be returned by current assignees for competitive assignment once its IMT status is confirmed.

19. MTN agrees with the Authority that capacity accessed via roaming arrangements cannot be treated equally to own-spectrum holdings, and thus included in the caps: this capacity is indeed subject to commercial arrangements that could be unwound; are time-limited and may be shared with the host network / other wholesale customers. Treating such capacity as owned spectrum for the purpose of caps would thus be highly distorting and may dis-incentivise firms to conclude such arrangements, when the Authority agrees they have significant competitive and efficiency benefits. MTN also notes the Authority's conclusions in the recent MBSI⁷:

"Even if MTN and Vodacom reach their full spectrum cap set out in the ITA (184MHz) and all of the smaller operator spectrum were added to each incumbent's share (100MHz each), which would be an incorrect approach as discussed above, then MTN and Vodacom's share would be 28% (of the 1015MHz total as set out in the ITA). While this would be higher than the post-auction cap imposed on Telkom and other licensees (184MHz, or 18% of the total), it is important to note that, as discussed above, Ofcom in the UK does not consider symmetry to be a pre-requisite for an operator to be effectively competitive, proposing a cap of 37% in a four operator market. Furthermore, Telkom and other licensees are able to use the additional capacity made available through the Vodacom and MTN MOCN deals via their own roaming arrangement with Vodacom (or MTN, if it chooses to switch in the future), and licensees may be able to participate in the WOAN's spectrum assignment (80MHz)."

The MBSI continues to conclude that:

"As such, while the Authority will monitor the competitive effects of these [capacity roaming] agreements, they are not currently considered to be harmful to the competitive process."

20. MTN supports these conclusions and believes that roaming arrangements should be encouraged to correct historical imbalances in spectrum assignments, imperfect auction rules and spectrum assignments at the forthcoming ITA.

⁷ Government Gazette 44337 dated 26 March 2021

Section F – Categorization of Tier 1 and Tier 2

Categorisation of Tier 1 and Tier 2 on the basis of retail market share in municipalities is irrational and unreasonable

21. MTN disagrees with the Authority's proposed methodology for and categorisation of MTN as Tier 1 operator and believes that it is irrational. It is impossible to understand how the definition of Tier 1 and Tier 2 must be applied in practice.
22. The confusion and contradiction in the definition are prejudicial to potential bidders because they are cumbersome, time-consuming and allow the Authority to exercise its discretion and powers in ways that are arbitrary and discriminatory.
23. The definition of Tier 1 operators is based on retail market share in ten (10) municipalities. The use of a threshold of 10 municipalities is entirely arbitrary. According to ICASA there are 234 municipalities in South Africa, and there is no rational basis for selecting ten municipalities as being the relevant threshold. A 45% market share in 4% of the country says nothing about the competitive position or wholesale credibility of an operator or why such an operator should be excluded from an Opt-In-Round. There is no formal link between retail market shares in a municipality and the ability of an operator to be a credible national wholesale operator.
24. In the 2020 ITA consultation process, MTN repeatedly requested to the Authority for clarification of the following questions and the Authority refused to provide a response:
 - What is the source of information that must be used to determine the retail market share of an operator in every municipality in the country?
 - Is the retail market share limited to voice or data?
 - Is the retail market share based on the number of subscribers or on revenue earned?
 - What date or dates must retail market share be calculated?
25. We refer the Authority to MTN's High Court application on this matter: Case No. 3619/2021 and the attached RBB Economist report (Annexure A hereto) for more details.

Section G – Rollout Obligations

Reasonable Roll-Out Obligation

26. MTN refers the Authority to its submission on the previous ITA IM and submits that reasonable roll-out obligations should be associated with spectrum licenses. In that regard MTN notes the 99.8% coverage obligation attached to Lot 9 in the previous ITA. We submit that such an extreme obligation makes such lots uneconomic and there is a high risk of spectrum remaining unassigned during a competitive auction (a substantial fiscus and welfare loss), or of the assignee failing to meet its obligations due to prohibitive roll-out costs involved (leading to potential license loss and/or litigation). MTN urges the Authority to reconsider such extreme targets to avoid regulatory failure.
27. MTN agrees that the obligations should be met using any spectrum assigned to a licensee, as forcing the sole use of ITA-acquired spectrum would only add costs, time, and inefficiencies to meet policy objectives, with no end-user benefit.

Section H – IMT 3500MHz Band

Level playing field in the Assignment of 3500MHz Band

28. Although the Authority argues that the IMT bands available for this auction will be made available on a technology neutral basis, the prime 5G mid-bands assignments are already significantly biased so-called Tier 2 operators. Most of this has been licensed via ad-hoc, uncontested assignments (see Rain's 80MHz and recent SMME assignments in the prime 3600-3800 ("3700MHz") band, as well as Telkom / Liquid's historical 84MHz assignment in 3500MHz). This situation could be further reinforced if the little 3500MHz spectrum left for assignment during the ITA (86MHz) is ringfenced away from so-called Tier 1 operators via an opt-in round as the Authority apparently intended to do in the 2020 ITA process. See Table 3 below.

Table 3 5G spectrum assignments (MHz)

	3500	3700	Total	5G
			ready	
Telkom	28		28	
Liquid	56		56	

Rain		80	80
SMMEs		120	120
Total already assigned to "so-called Tier 2"	84	200	284
Total available at ITA	86	0	86

Source: MTN

29. MTN does not understand the industrial logic behind constraining operators who have demonstrated a combined R10-15bn+ per annum CAPEX commitment to South Africa from fully participating in 5G, a critical piece of economic infrastructure for the country.

30. Irrespective of this, MTN believes that a level playing field should be created for the acquisition of the little 3500MHz spectrum left for assignment. This should be done via:

- the exclusion of 3500MHz from any Opt-In Round, should the Authority decide to pursue such a complex and unnecessary Opt-In-Round approach;
- the introduction of a sub-cap on prime 5G spectrum (3500MHz and 3700MHz) so that operators already enjoying significant holdings in these bands are prevented from accumulating even more, and, by the exclusion of 3500MHz from any Opt-In Round, should the Authority decide to pursue such a complex and unnecessary Opt-In-Round Approach.

Section I – Report to the Minister on Spectrum Requirements for 5G

31. Report to the Minister on 5G Spectrum. MTN notes that the Authority submitted a report to the Minister on spectrum requirements for 5G in the frequency bands lower than 6 GHz and millimetre wave (MMW) bands which were under study on the World Radiocommunications Conference 2019 ("WRC-19"). Be it as it may, MTN reads with great interest the Authority's 2021 annual report on the current status of 5G in South Africa⁸. It notes the following key recommendations from the 5G Council Committee:

- i. *"It is recommended that a minimum contiguous assignment of 80-100 MHz of spectrum in the mid-bands, and 400 MHz to 1GHz in the high bands, is*

⁸ The State of 5G in South Africa, From Readiness to Recommendations. ICASA, 2021.

needed to enable optimum, high-speed 5G services. There is a need for defragmentation and clearing of prime bands across all band ranges that have been identified for 5G.

- ii. The Authority needs to ensure the renewal of spectrum licences to provide certainty to the industry and to facilitate network investment and enable planning.*
- iii. Spectrum pooling is recommended to maximise benefits of available spectrum, as there is not enough bandwidth for all the mobile operators.*
- iv. Spectrum trading is also recommended to promote efficient spectrum use, as it allows spectrum rights to be transferred to those who will use spectrum efficiently.*
- v. It is recommended that auction spectrum prices be reduced, and that the AIP spectrum formula be adjusted to reduce the cost of using large, contiguous blocks of high band spectrum.”.”*

32. MTN supports these findings and recommends that the Authority embrace them in the forthcoming, and future ITAs.

Section J – Spectrum Requirement for WOAN

Spectrum Set-Aside

33. MTN supports submits the quantum of the spectrum set-aside for the WOAN as is adequate, especially given its wholesale-only mandate. MTN notes that given 3500MHz scarcity, the Authority may want to explore the assignment of other mid-band spectrum to the WOAN instead of the 30MHz set aside in 3500MHz: for example, 40MHz in the 2300MHz band is currently unencumbered, but was previously excluded from the ITA. This band is tipped to be one of the earlier 4G bands to be refarmed to 5G (together with 2100MHz and 2600MHz) in future. Given that the 5G wholesale market may take time to take-off, dedicating such bands to the WOAN so they can be migrated from 4G to 5G over time may make practical sense, and help unconstrain the 3500MHz spectrum scarcity issue highlighted earlier in our submission.

Section K – Specific Questions for Clarification

In addition, MTN poses the following questions to the Authority regarding the IM for additional clarity.

34. Set Aside ITA

- a) Will the Authority publish an entirely new ITA given the fact that the one published in 2020 has been set aside or will the previous ITA be only be modified/refined to consider the results of this IM process?

35. Bidding Documents

- a) Does the Authority expect new bidding documents to be submitted or amended bidding documents by those bidders who were part of the 2020 ITA?
- b) How will the Authority treat the R3 Million non-refundable payment paid by the previous bidders?
- c) How does the Authority intend to treat the R10 Million Bank Guarantee provided by the previous bidders?

36. Competition Assessment

- a) The Authority refers to the Competition Assessment undertaken prior to the publication of the 2020 ITA. The key findings of the Competition Assessment were set out in the Reasons Document⁹. Subsequent to the publication of the Reasons Document, the Authority published its Findings Document on Mobile Broadband Services Inquiry ("MBSI")¹⁰. The findings set out in the MBSI Findings Document were, in certain instances, at variance with those set out in the Reasons document. Is the Authority sticking with the Competition Assessment even though it is outdated?
- b) How does the Authority intend to reconcile the findings in the Reasons document (which informed the preparation of the 2020 ITA) with the more recent findings in the MBSI?
- c) Will the Authority consider the current market conditions in order to have a competition assessment that reflects the current state of competition in the various relevant markets?

37. Timing around the 700MHz and 800MHz Availability

- a) The timing around the availability of 700MHz and 800 MHz will have a significant impact on capex and spectrum values. Not knowing when the

⁹ Notice number 697 of 2020, Government Gazette number 43970 on 4 December 2020

¹⁰ Government Gazette number 44337 on 26 March 2021

frequencies will be available affects valuation, coverage, and other obligations.

- b) How did the Authority evaluate the reserve price for the 700MHz and 800MHz band in the 2020 ITA without knowing date of availability and usability of these band?
- c) What impact (or potential impact) would the incomplete digital terrestrial migration have on the terms and conditions, including the payment conditions, for IMT 700 and IMT800 spectrum issued under the ITA?

38. Eligibility and Activity Rules

- a) Under the current eligibility and activity rules in the 2020 ITA¹¹ once a bidder switches to Lot 9, the loss of eligibility implies that the bidder is no longer able to bid on the other Lots. This creates a material substitution risk that may result in an inefficient allocation of spectrum.
- b) Will the Authority review its eligibility and activity rules to ensure that bidders have flexibility to switch demand back and forth between respective Lots in response to changing auction prices without facing substitution risk?

Section L – Conclusion

- 39. All stakeholders including the Authority should approach this ITA with a view to simplify it, make it inclusive and avoid creating obstacles which will frustrate the process and cause further delays.
- 40. Given the recent experience, MTN believes it is essential for the Authority to consult on a draft ITA and allow for this process in its timeline.
- 41. MTN would like to reiterate its support to expediate this process in the manner in which the Authority's timelines are achieved. However, this will require the Authority to be open and transparent in this consultative process to avoid failure of the past ITA.

¹¹ Eligibility and Activity 2020 ITA (reference: 17.5.)

Annexure A – RBB Economist Report in Response to the Authority’s Competition Assessment