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By email: [satlicensing@icasa.org.za](mailto:satlicensing@icasa.org.za)

**Attention:** Mr Mandla Mchunu

13 November 2024

Dear Sir

**Consultation on the proposed new Licensing Framework for Satellite Services**

- 1 Anglo Corporate Services South Africa (ACSSA) has noted the Independent Communications Authority of South Africa's (ICASA) intention to conduct an Inquiry into the licensing framework for Satellite Services ("Inquiry").
- 2 While ACSSA is not a supplier of Satellite Services, we wish to express our support as an end user of Satellite Services. We support the development of a regulatory and/or licensing framework for Satellite Services in South Africa. This will enable South Africa to maintain pace with other jurisdictions which are already rolling out such technology. We note and support the intention to align with the Harmonised Model Framework for Licensing of Satellite Services in Africa.
- 3 We sincerely request that the regulatory reform process is expedited as there are many benefits to us as an end-user, and to the broader country. By way of examples:
  - 3.1 Technology of this nature has demonstrated promising results in other jurisdictions.
  - 3.2 In the face of natural disasters including extreme weather events (which are increasingly common worldwide) traditional communication infrastructure often suffers severe damage, resulting in significant disruption to emergency response efforts. The reliance on ground-based infrastructure becomes a vulnerability during such situations. Satellite Services, operating independently from terrestrial systems, ensure a resilient communication network that can be quickly deployed and provide uninterrupted connectivity during emergencies.
  - 3.3 The health and safety implications of improved connectivity cannot be understated. These technologies may enable remote telemedicine and telehealth services as well as facilitate remote monitoring and real-time data transmission in hazardous work environments, improving worker safety and reducing the risk of accidents.
  - 3.4 The opportunities presented by Satellite Services to bridge the digital divide between by providing connectivity to enable access to the internet for teaching and learning also cannot be underestimated.

A member of Anglo American plc group

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- 4 Pursuant to a limited Radio Equipment Type Approval granted by ICASA, ACSSA undertook some pilot testing of the Starlink technology. That testing yielded positive results. We see Satellite Services like Starlink as an incredible opportunity to provide access to internet connectivity to remote areas which currently either have unreliable access or no access at all.
- 5 Having read the Inquiry, our suggestions are as follows:
  - 5.1 For South Africa's purposes, we propose that the ATU policy principles (per Question 1 of the Inquiry) should be expanded to allow for recognition of the pace at which technology of this nature is developing and therefore regulators should be in a position to act with flexibility, discretion and speed.
  - 5.2 Per Question 3 of the Inquiry: while we support the approach of having a separate licence/authorisation for each segment of the Satellite Communication, we recommend that the licensing framework should appropriately provide for integrated as well as standalone licences for each of the segments. To accommodate for situations like our need to pilot and trial technology, we specifically suggest that provision for exemptions and trial licences to enable end users and others to test technologies must be included.
  - 5.3 To achieve the overall objective (which we assume to be access in remote locations), we recommend provision for flexibility in spectrum fees where appropriate and on good cause shown.
  - 5.4 To the extent that satellite service providers are required to provide details of their customers, the supply of information must be required to comply with data privacy protection laws.
- 6 Thank you for your kind consideration. We look forward to Satellite Services like those contemplated in the Inquiry being available in South Africa soon. We are available to address any questions you may have and/or participate in any further inquiries in this regard.

Yours faithfully

*Fiona Edmundson*

**Fiona Edmundson**  
**Director**

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