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November 12, 2024

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

Attention: **Mr. Mandla Mchunu**

Dear Sir,

Re: Submission of Comments on the Proposed Satellite Licensing Framework

We are writing in reference to the consultation document published by the Independent Communications Authority of South Africa (ICASA) on August 14, 2024.

On behalf of the Avanti Group, and its South African affiliate Cyberdine Secure Internet (Pty) Limited, we appreciate the opportunity to provide our input on the proposed Satellite Licensing Framework, and we commend ICASA's continued efforts to establish a robust regulatory environment for satellite communications in South Africa.

In our submission herein forwarded, we have addressed key considerations regarding regulatory consistency, market entry, spectrum allocation, and compliance requirements that we believe are vital to fostering a sustainable and innovative satellite sector. We have structured our responses to provide clarity on how the proposed framework may impact industry growth, service delivery, and economic development in South Africa and beyond.

We trust that our feedback will contribute constructively to the ongoing regulatory review process. Please do not hesitate to reach out if you require further clarification, consultation, or advisory support on any aspect of our submission. Avanti remains available to work closely with ICASA and other stakeholders to ensure that the framework aligns with best practices while advancing South Africa's telecommunications and satellite infrastructure goals.

Thank you for considering our submission as we look forward to continuing this important conversation as may be necessary.

Yours faithfully,

Asbjorn Christoffersen
Head of Regulatory Affairs

AVANTI RESPONSE TO ICASA SATELLITE LICENSING INQUIRY

About Avanti

Avanti is a leading Global Satellite Provider of fully integrated Multi-Orbit Connectivity Services. Avanti offers its customers dedicated fixed and flexible-beam, satellite connectivity, using the latest satellite technology, with extensive coverage across the globe. Our hybrid network and managed services deliver seamless integration with MNOs networks, giving customers the world's most reliable satellite connectivity. Avanti has a 50GHz of Ka-band capacity over 4 satellites owned and fully licensed, resilient, and secure ground network of 8 Gateway Earth Stations

As at today, we have put in 20 years of commitment to deliver reliable and highly secure satellite capacity - We guarantee coverage for defence missions, enterprise solutions, and critical public services. The company is ranked as the number one **high throughput** Ka-band satellite company in Africa (NSR report 2020 & 2022).

Avanti has always been dedicated to driving progress in Africa by championing local solutions and fostering connectivity through strategic partnerships across the region. 75% of Avanti's investment is in Africa, totalling over $897 million.
We are the only Ka-band satellite provider with gateways in Nigeria, SA and Senegal. With significant investments in Sub-Saharan Africa, Avanti distinguishes itself from other satellite operators by running multiple gateways throughout the continent. This commitment has led to the deployment of thousands of rural sites, empowering Mobile Network Operators (MNOs) and Tower Companies to extend their reach to even the most remote villages and communities. This is in addition to 580 Schools connected over Avanti's satellite fleet across Sub-Saharan Africa, enabling access to high-speed internet access and supporting digitization in education. In all, Avanti has succeeded in providing satellite capacity over 1.7 billion people across **118 countries** We believe that everyone should have an equal opportunity to be more secure, empowered, and prosperous

Through its affiliated company, Cyberdine Secure Internet (Pty) Limited, Avanti holds Individual Electronic Communication Service and Network Licenses, granted by the Independent Communications Authority of South Africa (ICASA). Demonstrating its strong presence and investment in South Africa's telecommunications landscape, Avanti operates a state-of-the-art Gateway Earth Station in Johannesburg. This facility is equipped to provide robust backhaul connectivity, supporting MNOs and other operators to their remote sites throughout the region and enhancing connectivity for millions of underserved South Africans.

HYLAS 4 uses the latest Ka-band technology to deliver cost effective internet capacity to South Africa using small spot beams that concentrate power and reuse spectrum on the following bands:
Uplink: 29.5 – 30.0 GHz; 30.0 – 31.0GHz
Downlink: 19.7 – 20.2 GHz; 20.2 – 21.2GHz

Introduction

The Independent Communications Authority of South Africa (ICASA) has taken a significant step forward by launching a public consultation on its new Satellite Regulatory Policy, inviting feedback from stakeholders both locally and internationally. This marks a groundbreaking move to establish a comprehensive regulatory framework for satellite services across South Africa. For Avanti and other industry players, this is an invaluable chance to contribute to shaping a robust, simplified, and future-proof policy that fosters innovation and ensures high standards in telecommunications service delivery. Avanti would like to advocate for best practices that will enhance the quality of service, streamline provider licensing, and bolster South Africa's position as a major player in satellite communications in Africa.

Avanti welcomes this initiative and below offers its feedback on ICASA's specific questions. Additionally, Avanti offers some comments on ICASA's overall approach to regulation, taking into account policy objectives regarding Historically Disadvantaged Persons.

Avanti's Posture and Feedback

Question 1

These are the policy principles from the ATU that ICASA seeks to align with. Kindly provide comment(s) on the proposed policy principles and any further recommendations listed in the above section?

Avanti Comment:

Avanti welcomes the initiative of the Authority (ICASA) to create a regulatory framework in line with the African Telecommunication Union (ATU) best practices. As South Africa works toward enhancing its satellite communications infrastructure, it is essential that any new regulatory framework be clear in its purpose and impact.

An effective framework must ensure regulatory certainty, be transparent, and foster durable investments in ICT networks and services across South Africa. Clear and consistent regulations will provide stakeholders with the confidence needed to make substantial, long-term investments in satellite infrastructure. Transparency in ICASA's intentions will also promote confidence within the industry, paving the way for innovative solutions that can enhance connectivity and support the country's socio-economic growth.

It is our view therefore that a simplified regulatory framework would help accelerate the deployment of satellite infrastructure across the country. Satellite networks require substantial investment in equipment, installation, and operation, which can be hindered by lengthy or costly regulatory processes. By reducing bureaucratic hurdles, ICASA and other relevant authorities could enable faster deployment of satellites and ground equipment, speeding up the reach of broadband services to areas where terrestrial infrastructure is unfeasible. In a simplified regulatory environment where the operational requirement and details of eligibility are documented, satellite providers could scale operations more efficiently, which would significantly contribute to South Africa's broadband penetration targets

We strongly urge ICASA to give precedence to these principles in finalizing the framework, as doing so will create a stable environment that attracts high-quality investments and supports sustainable growth in South Africa's ICT sector.

Question 2:

Do you agree with the exclusions of radio navigation satellite services, amateur satellite services, earth exploration, space research satellite services and radio astronomy services indicated above and others if applicable? If not, please explain your reasoning and propose an alternative to this proposal.

Avanti Comment:

Avanti as a multi-Orbit satellite service provider transmit primarily on the Ka Band frequency as follows:

Uplink: 29.5 – 30.0 GHz; 30.0 – 31.0GHz
Downlink: 19.7 – 20.2 GHz; 20.2 – 21.2GHz

In response to this question therefore, Avanti as a member of the GSOA hereby agrees with GSOA's recommendation to the effect that ICASA should adopt the ITU's Region 1 allocations for satellite services earth to space and space to earth.

Question 3

Do you agree with the proposed approach of having a separate licence/authorisation (where applicable) for each segment of the Satellite Communication value chain? Please elaborate.

Avanti Comment:

Avanti urges the adoption of a clear and straightforward approach. Using a more generic term for the operator delivering end-user services would help eliminate confusion, as the term "user terminal" might be misinterpreted as relating to equipment type approval. A term like "VSAT Network Service" would more accurately describe the service provided.

Avanti also advocates for a flexible, blanket licensing structure for spectrum access for user terminals deployed at customer or client sites, regardless of terminal size.

Once a piece of electronic communication equipment has received type approval, it should be available for use by any operator or individual without requiring additional approvals. Making type approval a one-time process would reduce regulatory overhead and foster a more efficient, user-friendly environment for service providers and their customers alike.

We also suggest that the Gateway Earth Station (GES), be licensed separately, with the licence detailing the scope of operations, licensing conditions, and assigned frequencies.

For a space segment operator that only provides satellite capacity, an elaborate licensing process is unnecessary. Instead, a simple and straightforward registration process would be ideal. The foreign space segment operator, as the satellite owner, should only need to notify the administration and register in order to land its traffic in the country. Prompt acknowledgment of landing permits or rights would then prevent unnecessary delays for new market entrants who have already fulfilled regulatory requirements. Likewise, the list of approved space segment operators should be automated and updated promptly, possibly, within 24 hours after registration of the new entrant. This approach supports a more efficient, streamlined entry process and encourages investment in the sector.

In addition to clarity, it is important that the regulator commits to effectively treat and respond to its customers by strict timelines. This will reinforce confidence in the regulator which projects the image of the administration as a first point of contact for the investor.

Question 4
Please provide your comments on the proposals in the preceding paragraph and the duration of the Gateway Earth Station licences.

Avanti Comment:

We respectfully urge the Independent Communications Authority of South Africa (ICASA) to provide clear clarification on whether a Private Electronic Communication Network (PECN) license is required in addition to an Individual Electronic Communications Network Service (I-ECNS) license for Gateway Earth Station (GES) operators to be fully authorized to build and operate satellite gateways. Providing precise guidance on this matter will enable operators to streamline their licensing processes, thereby minimizing unnecessary administrative burdens.

Additionally, there are existing Satellite Gateway Earth Station Operators who have obtained their licenses through the I-ECNS framework. We seek confirmation on whether ICASA will require these operators to relinquish or exchange their current I-ECNS licenses for PECN licenses, or if they may continue to operate under their existing licenses without additional requirements.

The category of licensing under the PECN appears to be novel, hence ICASA should deliberate more on the licensing conditions for a PECN license. Stakeholders would be happy to have a grasp of the details.

Avanti's position is that ICASA should establish a level playing field by recognizing and accommodating early market entrants who have already invested significantly under the previous regulatory conditions. To foster a fair and encouraging environment for continued investment and collaboration within South Africa's satellite communications sector, operators who have already secured licences under the current framework should not be penalised.

We believe that such clarity and fairness will not only support the growth and sustainability of satellite operators but also benefit Mobile Network Operators (MNOs) by facilitating seamless cooperation and service delivery. By addressing these licensing concerns, ICASA can significantly enhance the regulatory framework, promoting a robust and dynamic telecommunications landscape in South Africa.

Additionally, we would appreciate clarification on the definition of the "end user" in this context and a clear outline of which operators can receive services from the GES license holder. This approach would simplify regulatory requirements and promote efficient partnerships between MNOs and satellite operators, supporting seamless service delivery and growth in connectivity.

Building, owning, maintaining, and operating a gateway requires significant investment. Given this high cost, Avanti strongly supports a more flexible licensing structure. We propose that the Gateway Earth Station License should be granted with the option to renew each year indefinitely. This approach would provide long-term security for the license holder, encouraging investment and supporting the growth of gateway infrastructure.

It is also suggested here for emphasis that the GES Licensing should be bundled with spectrum for the feeder link {sec 31(2) ECA requires separate licensing}

Question 5
Please comment on the above-mentioned alternative proposals to levy the spectrum fees for Gateway Earth Stations and indicate your preferred option. The Authority understands that there are other spectrum fee calculation methodologies used elsewhere in the world. Please give details of the methodologies which you believe would be most suitable for South Africa.

Avanti Comment

Avanti concurs with the observation that the current satellite spectrum fees, in relation to the return on investment, are not financially attractive. As such, the introduction of a sector-specific pricing factor represents a significant and positive development. This initiative holds the potential to improve the financial viability of satellite operations and enhance the overall investment climate within the sector.

We respectfully request that ICASA consider reintroducing the Spectrum Efficiency Coefficient (SEC) factor for satellite services and adopt a more liberal, affordable spectrum fee structure. By setting relatively lower fees for both feeder links and service links, ICASA would foster a more favourable environment for satellite operators and stimulate further investment in the sector.

High spectrum fees can act as a barrier to entry and limit the growth potential for both new and existing satellite operators. By recalibrating these fees to be more economically viable, ICASA can encourage a wider range of services and expanded connectivity options for South Africa, especially in underserved and remote areas.

A liberalized fee structure that includes a revised SEC factor would acknowledge the unique characteristics of satellite services, which require specific frequency bands to maintain reliable, high-quality transmissions over large geographic areas. Reducing the cost of accessing these frequency bands would not only enhance the financial feasibility of satellite deployments but also enable operators to extend service reach, ultimately benefiting consumers and businesses alike.

Nigeria, as a neighbouring jurisdiction, has established a well-defined and precise spectrum pricing structure for its satellite services. We recommend that ICASA review the licensing framework adopted by its Nigerian counterpart. A

favourable satellite licensing regime, similar to that of Nigeria, would be both desirable and ideal for promoting growth and investment in the sector. By drawing on successful models, ICASA can create a more competitive and sustainable environment for satellite operators in South Africa.

Furthermore, Avanti has been paying a high cost of spectrum for more than 5 years. ICASA is call upon to incentivise AVANTI, going forward.

In conclusion, we believe that an updated, affordable approach to spectrum fees for satellite services will drive innovation, boost competition, and support South Africa's broader connectivity goals. We appreciate ICASA's consideration of this matter and remain available for further discussion or to provide additional insights on this proposal.

Question 6
Kindly comment on the section above and on the proposal for blanket licensing with a fee for a set number of terminals under a new proposed licence regime to be referred to as "Satellite User Station Network Licence". If possible, please provide a breakdown of the number of terminals with the corresponding spectrum fee values in South African Rands.

Avanti Comment
Blanket licensing is preferable, especially for small operators who need to reduce cost to be economically viable.

A generic name for VSAT Network Frequency license is more appropriate. The key term is the Frequency for VSAT services to end users.

Avanti discourages licensing based on the number of terminals rather favours simple and transparent licensing process.

Question 7:
Kindly comment on the appropriateness of using regulation 37 of the ICASA radio regulations ("Recognition of licences issued by other countries") to recognize ESIM licences issued by other countries

Avanti Comment
We recognize this position as best practices for visiting ESIM on board an aircraft or a vessel to be recognised by other countries once the vessel or aircraft is registered by the home country.

1. **Enhanced Global Connectivity and Interoperability**: ESIMs, by their very nature, are mobile and designed to provide seamless satellite connectivity across borders. Recognizing ESIM licenses issued by other countries enables satellite operators to offer uninterrupted services on a global scale. This recognition fosters smoother interoperability between networks, enhancing the reliability of satellite-based services for consumers and businesses operating across multiple regions.

2. **Facilitating Business Expansion and Operational Efficiency**: Satellite operators often deploy services across various countries, especially when providing mobility-based services like in-flight connectivity, maritime communication, or vehicle-based satellite systems. Recognizing ESIM licenses issued by trusted regulatory bodies in other countries reduces the administrative burden on operators by eliminating the need for duplicate licensing in each jurisdiction. This process allows operators to expand more quickly and efficiently, increasing their ability to serve international markets without excessive regulatory delays.
3. **Promoting Economic Growth and Innovation**: A recognition framework for ESIM licenses encourages innovation and investment in the satellite sector. When Administrations make it easier for operators to deploy satellite services across borders, they create a more attractive environment for investment in both infrastructure and service offerings. This can stimulate competition, improve service quality, and lead to lower costs for consumers, benefiting the broader telecommunications and technology sectors.
4. **Alignment with International Standards and Harmonization**: International cooperation and regulatory harmonization are vital for the growth of the global satellite communications industry. By recognizing ESIM licenses from other countries, nations can align their regulatory frameworks with international best practices,

promoting consistency and predictability in the satellite licensing process. This benefits both service providers and consumers, as they can expect the same standards and licensing procedures regardless of the country.

5. **Boosting Global Satellite Market Access**: The recognition of foreign-issued ESIM licenses helps create a more open and accessible global satellite market. As the demand for mobile satellite services continues to rise across industries such as aviation, maritime, and land transport, it is essential to enable operators to reach multiple markets without unnecessary regulatory obstacles. This recognition provides satellite service providers with the freedom to expand their reach, ultimately improving global connectivity.

Recognizing ESIM licenses issued by other countries for satellite connectivity supports global connectivity, reduces regulatory barriers, promotes investment, and aligns with international standards. It benefits satellite operators, enhances service delivery, and drives innovation across the satellite communications sector, ultimately contributing to the growth of a more connected and efficient global ecosystem.

Finally, ICASA should establish clear procedures for visiting vessels to notify the relevant authorities when they enter South African airspace or territorial waters. Additionally, there should be clear guidelines outlining how long vessels and aircraft can remain and transmit within South African territory. It should also be clear when aircraft providing in-flight connectivity need overflight authorization while flying over South Africa.

Question 8:
Please provide your comments and details of the best practices in other jurisdictions to fulfill the intentions of the Authority as indicated in the above section. Furthermore, considering the provision set out in the Astronomy Geographic Advantage (AGA) Act of 2007, and the requirements of the Radio Quiet Zone, what measures and techniques do you propose to be employed in mitigating the possible interference that may be caused by the satellites within the Astronomy radio frequency bands in South Africa?

Avanti Comment:

Avanti aligns its position with GSOA on the benefits and desirability for open skies regime generally favoured for its contribution to an all-inclusive and non-discriminatory participation by authorised operators. However, for the purpose of control and quality assurance, ICASA should develop and effective capability to screen entrants based on capability and investment prospect that would both meet the connectivity and economic development needs of the administration.

ICASA should clearly distinguish between the duration of landing permits for existing and new satellites. For existing satellites, especially those nearing the end of their operational life, the landing permit should reflect the remaining lifespan of the satellite, including any potential renewals. New satellites should receive landing permits that align with their expected operational lifespan. This distinction will ensure clarity and consistency in regulatory practices, providing proper authorization for both current and future satellite operations. This should also apply for the GSO on the one hand and the NGSO constellations of Satellite on the other hand.

Information about potential customers may not be available but use cases of service description should suffice for ALOSS. It should also be emphasised that the requirement for making the ALOSS list should not include a coordination with the administration of South Africa as all existing Satellite Service providers would have concluded coordination before launch in line with the ITU-R Radio Regulations.

Without reinventing the wheel, ICASA should clearly delineate and specify the various frequency spectrums allocated for satellite operations, including both Earth-to-Space and Space-to-Earth frequencies, in alignment with the ITU Radio Regulations. This will ensure that satellite operators have a clear understanding of the designated frequency bands and their respective uses, thereby promoting compliance with international standards and facilitating efficient coordination within the global telecommunications framework. Establishing such clarity will help avoid potential interference, support optimal spectrum management, and ensure that South Africa remains in line with global regulatory practices.

Question 9
Please provide proposals on the role the Satellite operators can play in ensuring that broadband connectivity reaches the areas of the country in terms of community networks with Satellite connectivity as a backhaul. Kindly provide a regulatory solution that can be applied by Satellite operators to address the shortcomings of terrestrial networks in

providing to unserved and underserved areas of the country. This may include collaboration with government programs to reach out to those unserved and underserved areas of the country.

Avanti Comment:

Satellite services providers can contribute to broadband penetration and internet connectivity in remote and unreached towns and villages through satellite capacity backhaul across remote sites and between sites and address the shortcomings of terrestrial networks in providing to unserved and underserved areas of the country.

Satellite service providers can make a substantial contribution to broadband penetration and internet connectivity in South Africa's remote and underserved towns and villages. Through satellite capacity backhaul, these providers already connect isolated and hard-to-reach sites with the main internet network, creating a reliable broadband infrastructure where terrestrial networks are challenging or economically unfeasible. Given their ability to cover vast geographical areas with minimal on-ground infrastructure, satellites offer a critical solution to bridge the connectivity gap, reaching areas where laying fibre-optic cables or constructing cell towers would be prohibitively costly or technically challenging.

In unserved and underserved regions, terrestrial networks face significant obstacles, including difficult terrain, low population density, and high deployment costs. These limitations make it challenging for mobile network operators (MNOs) and internet service providers (ISPs) to justify large investments in network infrastructure. Satellite backhaul can overcome these barriers by providing an alternative link from the core network to isolated regions, enabling local ISPs or MNOs to extend their services without extensive infrastructure investment. Satellite services enable consistent, high-speed internet across these regions, supporting essential services like telemedicine, online education, and e-government applications, which can significantly improve quality of life and economic opportunities for rural populations.

Strategy and Stages for Government Collaboration with Satellite Providers and MNOs

To make the most of satellite technology for rural connectivity, a multi-stage strategy involving government programs, satellite providers, and MNOs could prove effective:

1. **Pilot Programs and Initial Funding Support:** In the first stage, the government could identify key underserved rural areas for pilot connectivity programs, providing partial funding or subsidies to satellite operators to deploy satellite backhaul infrastructure. These pilots would showcase satellite technology's effectiveness, allowing the government and local communities to assess the viability of satellite-based solutions in various rural settings.
2. **Public-Private Partnerships (PPP):** In the next stage, government agencies could formalize partnerships with satellite providers and MNOs to scale satellite-based solutions. These partnerships would facilitate cost-sharing and enable collaborative planning for satellite deployments, as well as simplify regulatory processes. This could include regulatory concessions, such as easier licensing terms for satellite operators specifically serving remote areas or shared-use infrastructure agreements to maximize efficiency.
3. **Incentivizing Local Service Providers and Expanding Coverage**: As a scaling strategy, the government could introduce targeted incentives for local ISPs and MNOs to leverage satellite capacity for backhaul in underserved areas. This stage could include tax benefits or tax holidays, streamlined licensing, and reduced fees for ISPs and MNOs utilizing satellite solutions to reach these areas. The aim would be to reduce costs for operators, making it more viable for them to offer affordable services to rural consumers.
4. **Universal Service and Access Agency of South Africa (USAASA)**
   The Universal Service and Access Agency of South Africa (USAASA) plays a vital role in bridging the digital divide by partnering with satellite service providers to deliver universal connectivity to remote communities

when its roles are fully harnessed and conceptualised. By facilitating infrastructure development and supporting service rollouts, USAASA should ensure that underserved areas gain access to reliable telecommunications. To incentivize operators, USAASA can offer subsidies, grants, and tax breaks, as well as streamline regulatory processes. Public-private partnerships and long-term contracts can also encourage investment and participation, ensuring that providers have both the resources and motivation to expand their services, enhancing nationwide digital inclusion and socio-economic development.

5. **Ongoing Support and Universal Service Obligations (USOs)**: Finally, the government could ensure ongoing support through policies that mandate Universal Service Obligations (USOs) aligned with satellite solutions. Satellite providers and MNOs could be encouraged to meet these obligations through further financial incentives, capacity-building initiatives, or infrastructure-sharing mandates, ensuring that affordable and reliable connectivity remains accessible.

This collaborative approach will enable the government to harness satellite technology as a powerful tool for rural development. With satellite backhaul providing a resilient alternative to terrestrial networks, the strategy can overcome geographic and financial barriers to connectivity, transforming South Africa's remote regions and integrating them into the digital economy.

GENERAL COMMENT ON REGULATING FOR QUALITY ASSURANCE AND COMPETITION

Avanti Communications requests a clarification from ICASA regarding the continued requirement to hold I-ECN/S licences in order to provide satellite services in South Africa. Avanti understands that ICASA's proposals do not substitute the current I-ECN/S framework, which includes measures promoting economic inclusion for Historically Disadvantaged Persons (HDP), creating local employment, ensure knowledge transfer, and develop a resilient telecommunications industry in South Africa. Retaining the HDP requirement in satellite telecommunications licensing in South Africa is essential for several reasons that align with both socio-economic goals and the need for sustainable development in the sector. Here is why this requirement, coupled with regulatory measures to ensure quality and service effectiveness, is crucial:

1. Promoting Economic Inclusion: The HDP requirement is a strategic tool to promote economic inclusion and address the disparities created by historical inequalities. By mandating HDP compliance in satellite telecommunications licensing, South Africa ensures that previously marginalized groups can participate in and benefit from the sector's growth. This fosters a diverse and inclusive industry that better reflects the demographics of the country and contributes to broader economic empowerment.

2. Driving Local Industry Growth: Requiring HDP compliance supports the growth of local businesses by creating opportunities for partnerships, joint ventures, and local investments. Public telecommunication service providers that meet HDP criteria can help stimulate local industries, build technical expertise and facilitate knowledge transfer, create employment opportunities, and enable the adoption of innovative technologies, contributing to a more robust and competitive telecommunications sector in South Africa.

3. Quality Assurance and Service Provisioning: Regulating market participants is essential for maintaining high standards and securing resilience in the satellite telecommunications industry. By ensuring local control of telecommunications services, regulatory bodies like the Independent Communications Authority of South Africa (ICASA) can ensure that operators meet technical, safety, and service delivery benchmarks to maintain an effective and stable service environment. This is especially important as satellite technology plays a crucial role in connecting rural and underserved areas where reliability and performance can directly impact socio-economic progress.

4. Building Consumer Confidence: A well-regulated satellite telecommunications industry with HDP-compliant providers inspires consumer confidence. It signals that operators are committed not only to high service standards but also to contributing positively to the social and economic landscape of the country. Consumers benefit from more reliable services, while the nation benefits from a telecommunications sector that prioritizes sustainable and inclusive growth.

Retaining the HDP requirement within satellite telecommunications licensing and regulating entrants for quality assurance is essential for promoting economic equity, driving local growth, and ensuring high standards of service. Together, these measures support the overarching goal of expanding connectivity, bridging the digital divide, and fostering a competitive, inclusive, and efficient telecommunications environment in South Africa.