

Independent Communications Authority of S A

350 Witch-Hazel Avenue,
Eco Point Office Park
Eco Park, Centurion

Private Bag X10,

Highveld Park

0169

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DRAFT CALL TERMINATION REGULATIONS – of 22 March 2024 Comment

Good Day Sir / Madam,

I would like to thank the ICASA Team for finally achieving the desired Interconnection rates for Voice calls after 20 years.

Whilst this process is finally concluding 20 years late when MTN – Vodacom and Telkom enjoyed maximum profiteering from the poor consumers to the disadvantage of all the New players demise and struggles. When public comment is sought and there is this one truly open and transparent unbiased view then ICASA must surely consider and use this public information in decision making.

My points are listed below and is intended to help ICASA in whatever way they see fit.

1.The progression of the mobile Termination Rate to 4c per minute On 1 July 2025 with eventually being removed in totality from Voice calls in SA is more reflective of the actual cost of Termination.

2. The only change to the document published is that the fixed termination rate of 0.01 from 1 July 2025 should be increased to 0.02 to allow the fixed operators to claw some money back from the established mobile Operators.

3. I believe that ICASA needs to give effect to the total removal of Interconnection Rates in South Africa from 1 July 2026 for the following reasons.

a) The originating operators keeps all the charges he levels on his customer. There is no need for him to pay at the end of the month to other operators.

b) Call rates will come down on its own as operators will try to carry maximum amount of calls their Network can handle to make maximum profits.

c) The stranglehold that MTN & Vodacom duopoly have on the Voice market will eventually be broken up with no action from anyone required.

d) Asymmetry afforded to Telkom and Cell-c did not yield any positive results as they failed miserably at cutting voice rates to attract more customers away from Vodacom & MTN by having the advantage of receiving more money from the incumbents than they pay them.

e) Any new operator seeking Asymmetry must be advised to lower call costs to the maximum to ensure they benefit from this privilege of acquiring a customer base quickly with low call rates.

I call on ICASA to start investigating introducing ceiling Tariffs for Voice Calls in SA as there is insufficient competition to force pricing downwards. Example. The maximum cost for ALL voice calls for mobile & Fixed should be set at 30c per minute billed per second.

I further call on ICASA do undertake a costing of the Mobile Data pricing operators are charging customers in SA many of whom are prepaid and purchase smaller data bundles.

The average cost of Mobile Data being around R1 a gigabyte on cost but are charged close to R50 per Gigabyte to the ordinary customer.

ICASA needs to set a glide path for the reduction of Mobile Data valid for 30 Days.

Volume of Data	Date Affective	Cost to Customer
1 Gigabyte	01 July 2024	R60
	01 July 2025	R30
	01 July 2026	R15
	01 July 2027	R10

I also call on ICASA to ensure each Mobile operator provides the first 25 free SMS's per month to every mobile customer. Charges on SMS need regulation as well to ensure the Banks do not charge us R1 for a Transaction Notification. SMS charges needs regulation as well. Corporate SA takes advantage of Black people in power and we must stop this nonsense.

Regrettably I will not have time to make oral representation for this public comment.

Kind Regards

Ashley Madraymuthoo

084 333 0510

ashley@dxl.co.za