



12 November 2024

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

Attention: Mr Mandla Mchunu  
Per email: [satlicensing@icasa.org.za](mailto:satlicensing@icasa.org.za)

Dear Mr Mchunu,

**RE: ICASA's Proposed Licensing Framework for Satellite Services**

1. Maziv welcomes an opportunity to comment on the inquiry by the Independent Communications Authority of South Africa ("ICASA" or the "Authority") into a proposed Licensing Framework for Satellite Services as published in the Government Gazette, Notice No. no. 51044 dated 14 August 2024.
2. Maziv supports the underlying policy principles and objectives of this inquiry, notably, to develop a transparent and streamlined regulatory framework with clear rules to create regulatory certainty for potential satellite operators in South Africa. We are of the view that the principle of regulatory certainty should not only be applicable to potential satellite operators only but should be extended to all potential investors in the telecoms sector in order to create an investor friendly environment.
3. There is a dire need for the roll-out of communications networks to support socio economic development and affordable internet access for all South Africans. Maziv, through its wholly owned subsidiaries Vumatel and DFA, currently provides wholesale fibre connectivity services, particularly in low-income areas. There are significant differences between fibre and satellite connectivity when it comes to capacity and functionality. Fibre optic internet is faster, affordable and more reliable than satellite internet. It is also less susceptible to environmental interference than fibre optic cabling. However, where no other options are available, for example where the terrain or



environment mitigates against terrestrial services or where terrestrial services cannot be provided, satellite connectivity is an option.

4. We understand that the Authority considers satellite communications services as constituting electronic communication services under the Electronic Communications Act of 2005 and as such, is of the view that a licence is required to provide satellite communication services. We also understand that ICASA's inquiry is only applicable to Fixed Satellite Services, Mobile Satellite Services and Broadcasting Satellite Services, and agree with the exclusion of radio navigation satellite services, amateur satellite services, earth exploration, and space research satellite services from the scope of this inquiry.
5. In light of the above, Maziv appreciates the Authority's intention to develop a regulatory framework for the licensing and provision of potential satellite operators in South Africa, including procedures for the registration of international satellite operators (who intend to provide a service either directly or indirectly through existing licensed operators to South African consumer) and procedures for authorising user-terminals, IoT terminals, and earth station user terminals communicating with space stations while in motion. We further understand that ICASA intends to review spectrum fees, taking into account the increasing amount of bandwidth use by satellite systems in higher frequency bands, and we support the payment of spectrum fees in order to ensure the efficient use of spectrum.
6. We have provided general guidelines below for the Authority to consider, which we trust will assist the Authority in the finalisation of the Satellite licensing framework. We propose that the Authority considers:
  - Connectivity and bandwidth need in rural areas.
  - Possibility of considering the inclusion of universal service obligations to Public Service Institutions in the satellite licensing framework, in view of the potential of satellites to provide broadband connectivity to large areas.
  - Regulatory processes which are not so onerous and timeous such as to deter investment in South Africa. This includes licence fees as well as separate licenses and registration regimes. We support applicants (such as application for a Gateway Earth Station licence) not requiring individual electronic communication licences where they are not providing services directly to end users and also support any measures that reduces the regulatory burden for both licensees and ICASA.
  - Adherence to timelines for satellite licensing processes.



- The need for coordination between regulatory entities, government, regional and international organisations such as ATU and ITU, and alignment with relevant radio regulations.
- Consistent application of licensing requirements to all similarly licensed entities, such as ownership by historically disadvantaged individuals and requirements for B-BBEE to ensure a level playing field in the ICT sector.

We trust the Authority finds the above in order and look forward to the finalisation of an appropriate licensing framework for satellite services.

Yours Sincerely

**Moses Mashisane**  
**Chief Regulatory and Compliance Officer**  
**Maziv (Pty) Ltd**