

11th November 2024

Independent Communications Authority of South Africa (ICASA)
350 Witch-Hazel Avenue
Eco Point Office Park
Eco Park
Centurion, 0157

For attention: Mr. Mandla Mchunu (satlicensing@icasa.org.za)

SUBMISSION OF COMMENTS ON ICASA'S SATELLITE LICENSING FRAMEWORK

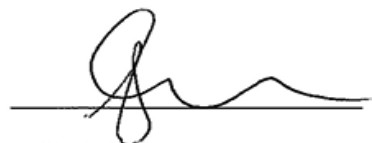
On behalf of Paratus Telecommunications (Pty) Ltd, we would like to express our appreciation to ICASA for the opportunity to provide input on the proposed Satellite Licensing Framework. We recognise the importance of this consultation process in shaping a modern and inclusive regulatory environment that will support the growth of satellite services in South Africa.

Although we have provided comments and recommendations on specific sections of the framework in our submission, we wish to note that we have not addressed all the questions posed by ICASA at this stage. However, Paratus reserves the right to submit further comments and respond to any additional questions before a final policy decision is made.

We remain committed to working collaboratively with ICASA to ensure that the final framework promotes an equitable, competitive environment for satellite operators and fosters innovation and investment in the sector. We are particularly focused on ensuring that satellite connectivity continues to play a pivotal role in bridging the digital divide and delivering universal access to underserved areas of the country.

We appreciate the opportunity to contribute to this critical process and look forward to continued engagement with ICASA to achieve a future-ready satellite market in South Africa.

Yours sincerely,



Kallie Carlsen

Managing Director

Paratus Telecommunications (Pty) Ltd

PARATUS' RESPONSE TO ICASA'S SATELLITE LICENSING FRAMEWORK CONSULTATION DOCUMENT



PARATUS TELECOMMUNICATIONS (PTY) LTD (PARATUS)
11 November 2024

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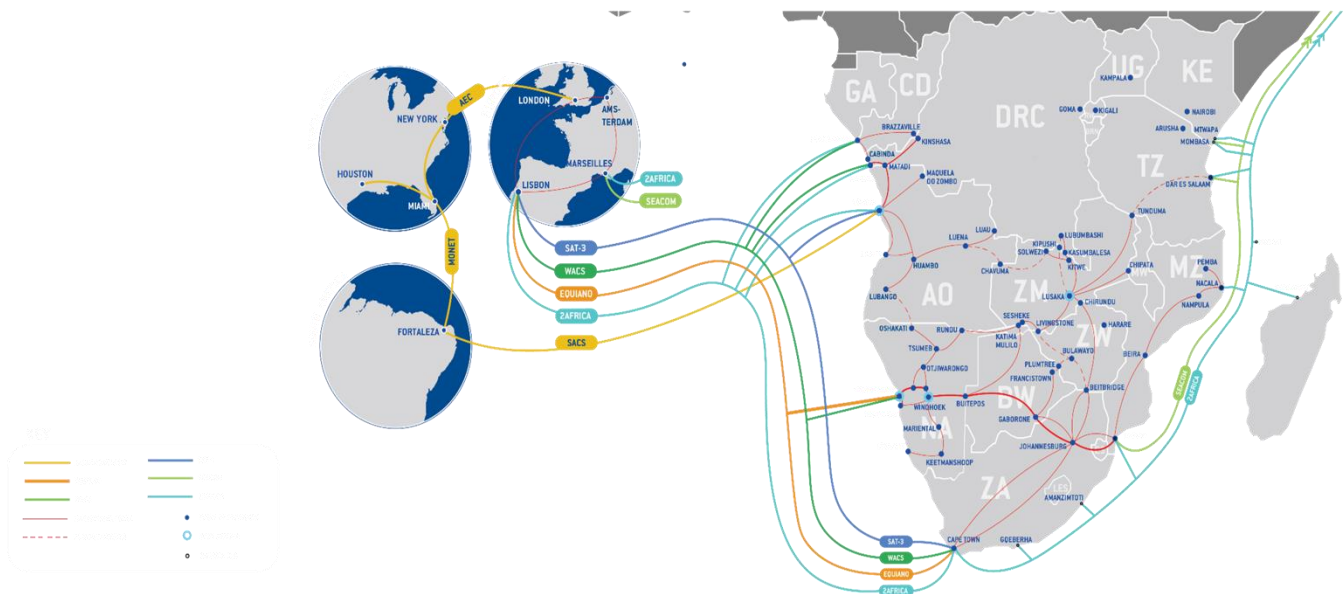
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1. Background

Paratus Group is a leading pan-African telecommunications provider, operating across seven African countries—Angola, Botswana, the Democratic Republic of Congo (DRC), Mozambique, Namibia, South Africa, and Zambia. Additionally, Paratus has acquired ISP-type regulatory licenses in Eswatini, Malawi, Kenya, and Rwanda, with pending license approvals in Tanzania, Uganda, and Zimbabwe. The company delivers satellite services across multiple African countries, managing over 5,000 satellite terminals and operating three teleports. As a pioneer in connectivity, Paratus provides integrated network solutions, including satellite, fibre, data centres, cloud, and mobile data services, cementing its role as a key player in Africa’s digital transformation.

In addition to its extensive satellite network, Paratus has invested significantly in infrastructure development. This includes landing the Equiano subsea cable in Namibia and operating world-class data centres across Africa. Paratus is committed to fostering Africa’s digital transformation by providing high-quality, resilient, and scalable connectivity solutions to businesses and governments, particularly in underserved areas.

Born and bred in Africa, Paratus is continually redefining limits and breaking boundaries to provide a service that works without compromise and sets the bar for providing quality connectivity in Africa.



2. Introduction

ICASA's proposed Satellite Licensing Framework aims to modernise South Africa's satellite regulations in response to rapid technological advancements and rising demand. It intends to introduce new licensing categories for Satellite Gateway Earth Stations, Satellite User Terminals, and Space Segment registration to better reflect the satellite ecosystem and enhance regulatory clarity.

For Paratus, this consultation is vital in shaping South Africa's satellite landscape, especially given our recent investment. While the framework presents both opportunities and challenges, it opens a pathway for critical industry evolution.

Through this submission, Paratus seeks to support ICASA in creating a regulatory framework that fosters innovation and promotes investment in South Africa's satellite and digital infrastructure. We appreciate the chance to provide our insights to help shape a fair, competitive, and future-ready satellite market.

3. Paratus' response to the Consultation questions:

Please note that, while Paratus is not providing responses to every question in the consultation document at this time, we reserve the right to submit additional comments or address further questions if circumstances change or new information emerges. This approach gives Paratus the flexibility to engage meaningfully as the consultation process evolves, ensuring that our feedback stays relevant and aligned with any developments in the regulatory landscape.

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 this section?

Paratus fully supports ICASA's alignment of the Satellite Licensing Framework with the African Telecommunications Union (ATU) policy principles. These principles, focused on balanced spectrum management, fair competition, and widespread satellite access, are essential to driving innovation and investment in Africa's connectivity landscape. By prioritising these values, ICASA can ensure that South Africa's satellite framework facilitates growth and inclusivity in the telecommunications 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?

Paratus agrees with ICASA's exclusion of specialised services, such as radio navigation satellite services, earth exploration, space research, and radio astronomy, from the commercial satellite licensing framework. These services primarily serve scientific, governmental, and research purposes, with dedicated frequency allocations that generally do not overlap with

commercial satellite operations. Excluding these services ensures that ICASA avoids regulatory redundancy and remains compliant with international agreements under the ITU.

2.1 C-band Spectrum Exclusion Concerns

Paratus agrees with inclusions of the bands within the schedule, however, we have noted the exclusion of the C-band spectrum from the spectrum assignment table. The C-band is crucial to satellite operations due to its resilience and broad geographic coverage, which make it indispensable for maintaining reliable connectivity, especially in high-rainfall areas where other bands (e.g., Ku- or Ka-band) may be less effective. Excluding C-band from the licensing framework would disrupt essential services, reduce operators’ options for providing connectivity, and negatively impact end users who depend on C-band for critical communications, including emergency services, business continuity, and government operations. As Paratus extensively uses C-band for its operations, excluding it from the licensing framework would severely disrupt our services, limit operational flexibility, and negatively impact our ability to meet customer needs. We strongly recommend that ICASA include the C-band within the licensing framework to ensure continuity of our services to our customers.

Service Category	Below 1GHz	L-Band	S-Band	C-band	Ku-Band	Ka-Band	Q & V Band
Non-voice NGSO MSS	137 – 138 MHz						
	148 - 150.05 MHz						
	399.9 – 400.05 MHz						
	400.15 – 401 MHz						
Voice MSS & narrowband MSS		1525 – 1559 MHz					
		1626.5 – 1660.5 MHz					
		1610 – 1626.5 MHz					
			2483.5 – 2500 MHz				
2GHz MSS			2000 - 2020 MHz				
			2180 – 2200 MHz				

GSO & NGSO FSS				3.7 - 4.2 GHz	10.7 – 12.2 GHz	18.3 – 18.8 GHz	40 – 42 GHz
				5.925 - 6.425 GHz	14 – 14.5GHz	19.7 – 20.2 GHz	47.20 – 51.40GHz
					2	27.5 – 30GHz	
GSO & NGSO MSS				3.8 – 5.925 GHz		19.7 – 20.2 GHz	
						29.5 – 30GHz	

(Table 1: Radio frequency table with C-band included)

Recommendation: We propose that ICASA **must** include the C-band frequencies in **Table 1** above (**highlighted in red**), for commercial satellite operations to ensure that operators like Paratus can continue delivering reliable services to its customers. C-band’s unique capabilities make it indispensable for delivering broadband and communication services in challenging environments. Excluding this spectrum would disrupt Paratus’ operations.

2.2 Clarifying Amateur Satellite Services and Ensuring Fair Competition

While Paratus recognises the importance of amateur satellite services for educational, experimental, and hobbyist purposes, there is a growing concern regarding the potential for amateur satellite services to evolve into commercial operations without being subjected to the same regulatory oversight as licensed commercial operators. Amateur satellite services are typically designed for personal, educational, or research purposes, but as satellite technology becomes more accessible, the lines between amateur and commercial operations can become blurred.

The increasing accessibility of satellite technology means that what begins as an amateur operation, focused on experimentation or personal use, can quickly grow into a larger-scale service provider with hundreds or even thousands of customers. The concern here is that these operators can remain classified as amateur, benefiting from regulatory exemptions, while essentially running a commercial operation that competes with licensed operators like Paratus. This creates an uneven playing field, where licensed operators are subject to regulatory and financial obligations, such as spectrum fees and Universal Service and Access Fund (USAF) contributions, while amateur satellite operators may escape such responsibilities.

Clarification is Needed:

To avoid this regulatory ambiguity, ICASA must clearly define what constitutes amateur satellite services in terms of the satellite licensing framework. We would like to recommend that the following definition be included in the definition section: **“Amateur Satellite service - shall be defined as the type of radio communication services that utilises space-based satellite systems, which are operated by a licensed amateur radio user for non-commercial purposes which includes but shall not be limited to educational, scientific and personal communication activities for the purposes of advancement in technical skills and experiment**

with satellite communications. The user shall not be permitted to obtain any commercial and/or financial benefit from such services either directly or indirectly.”

Question 3: Do you agree with the proposed approach of having separate licensing/authorisation (where applicable) for each segment of the Satellite Communication value chain? Please elaborate.

Paratus agrees with ICASA’s approach to introduce separate licenses for segments of the satellite communication value chain, specifically for gateway stations and user terminals. This segmented approach ensures that regulatory oversight is tailored to the specific operational and technical requirements of each segment, contributing to a more structured and efficient framework for the industry.

However, it is crucial to ensure that the requirements to apply for these licenses are uniformly applied to all operators, including both local incumbents and new entrants into the South African market. Allowing certain players to bypass or be exempt from these requirements would create an unfair competitive advantage, disadvantaging existing operators who comply with the full regulatory framework. Consistent application of these licensing requirements is essential to maintaining a level playing field and fostering a fair and competitive satellite market.

Paratus urges ICASA to regulate that all entrants into the South African market must adhere to the proposed licensing and compliance requirements. This approach will prevent disparities in operational obligations, ensuring fairness across the industry while encouraging sustainable growth and investment.

Question 4: Please provide your comments on the proposal regarding the duration of the Gateway Earth Station License.

Paratus acknowledges ICASA’s proposal for a five-year duration for the Gateway Earth Station License. However, Paratus recommends that ICASA consider offering a longer license duration, such as 10 years, which should be linked to the Individual Electronic Communications Network Services (I-ECNS) and Individual Electronic Communications Services (I-ECS) licenses for operators that demonstrate sustained compliance and ongoing investment in satellite infrastructure.

A 10-year license would provide several critical benefits:

1. **Greater Regulatory Certainty:** A longer license period would give operators like Paratus the regulatory certainty needed to plan long-term investments in satellite infrastructure. Shorter license terms can create uncertainty for operators, potentially discouraging significant investment in infrastructure projects that require time to yield returns.
2. **Encouraging Long-Term Investments:** A 10-year license would incentivise operators to make long-term infrastructure investments. Satellite networks and gateway stations require significant upfront capital expenditure, and a longer license duration would allow operators to recover these costs over a more extended period. It also aligns with the lifecycle of satellite projects, which often span a decade or more.

3. **Alignment with International Best Practices:** Many jurisdictions globally, like Ghana¹ and India², offer longer licensing terms for satellite services, recognising the long-term nature of satellite infrastructure investments. By aligning with international best practices, South Africa can remain competitive in attracting investment in satellite technologies, ensuring that operators like Paratus can continue to expand their services in the country.
4. **Linked to I-ECNS and I-ECS Licenses:** By linking the Gateway Earth Station License duration to the existing I-ECNS and I-ECS licenses, ICASA would create a consistent and integrated regulatory environment for satellite operators. This alignment would ensure that the licensing framework is streamlined and avoids unnecessary administrative renewals that may disrupt operations or deter investment.

Additionally, Paratus suggests including provisions for automatic renewal upon compliance with regulatory obligations, subject to periodic reviews. This approach would further reduce administrative burdens for both operators and ICASA, while ensuring that only operators who meet the necessary compliance standards continue to benefit from automatic renewals.

Question 5: Please comment on the alternative proposals to levy spectrum fees from gateway earth stations and indicate your preferred option. ICASA understands that there is 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.

Paratus acknowledges ICASA's proposal to levy spectrum fees for gateway earth stations and appreciates the Authority's effort to balance competitiveness and accessibility in the market. We believe that spectrum fees must be based on a transparent and fair methodology that reflects the realities of satellite operations and considers the diverse environments in which these services are delivered. It is equally critical that the fee structure avoids creating barriers that could inadvertently favour international entrants over local operators.

After reviewing both the proposed HTS fee factor and the alternative spectrum fee model, Paratus supports the alternative option. This approach, which bases variable fees per MHz on the frequency band in use, better accounts for the unique characteristics of different frequency ranges. The alternative model ensures a fairer and more balanced fee structure by recognising the distinctions between lower and higher frequency bands. By adjusting fees to reflect the relative size of frequency assignments and the limited spectrum availability in lower bands, this approach promotes equitable pricing across all frequency ranges.

The alternative model also proposes applying spectrum license fees per license rather than per Earth station. By reducing administrative burdens, this framework provides a scalable and practical solution for managing spectrum costs while aligning with the operational realities of modern satellite networks.

Paratus believes the alternative spectrum fee model offers a fairer, more sustainable, and operationally efficient structure. It supports the needs of operators while promoting

¹ Ghana offers a license duration of 10-year for their gateway licenses - <https://nca.org.gh/wp-content/uploads/2024/06/Satellite-Licensing-Framework-in-Ghana-2.pdf>.

² India offers a license duration for the Satellite Earth Station Gateway (SESG) License of 20 years from the effective date of the license, with a provision for renewal for an additional 10 years https://www.trai.gov.in/sites/default/files/Recommendation_29112022.pdf

sustainable growth in the satellite industry. We recommend ICASA adopt this approach to ensure a balanced and forward-looking spectrum fee framework that benefits all stakeholders.

Globally, many regulatory authorities adopt similar **fee calculation methodologies**. For example:

- In **Namibia and Finland**, spectrum fees are often determined by bandwidth usage, with additional adjustments based on the type of service provided and geographic factors³.
- In **Australia**, spectrum fees are reduced for operators providing services in rural areas, recognising the higher costs and lower revenue potential of these regions.⁴
- **ITU's** Radio Regulations fee model provides a widely accepted structure based on a combination of bandwidth, frequency band, and service type, ensuring that spectrum fees reflect the specific needs and use cases of each operator⁵.

Implementing a fee model incorporating these considerations would benefit Paratus in several ways:

- **Align spectrum costs with service delivery realities:** Paratus often provides services in remote and underserved areas where the cost of deployment is high, but revenue generation is lower. A fee model that accounts for geographic disparities would help Paratus maintain sustainable operations in these regions.
- **Ensure equitable competition:** By adjusting fees based on bandwidth usage and frequency bands, Paratus would be able to compete more effectively against larger operators, who may use higher bandwidth capacities. This would allow for more equitable spectrum access.
- **Continue investing in public interest services:** Reduced fees for services such as rural connectivity or emergency communications would enable Paratus to continue investing in infrastructure projects that support South Africa's universal access goals, while ensuring that fee obligations remain manageable.

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

Paratus agrees with ICASA's proposal for a blanket licensing approach under the "Satellite User Station Network License," with a set fee for a specific number of terminals. This setup simplifies the process for operators, making it more manageable to deploy and maintain large numbers of terminals. However, it's essential that the cost structure for this license does not inhibit business operations for local players by becoming prohibitively expensive.

³ https://www.ppiaf.org/sites/default/files/documents/2021-01/Spectrum_pricing_and_fees_v03_PLUM_REVISIED_FEB22_clean.pdf

⁴ https://oia.pmc.gov.au/sites/default/files/posts/2021/06/spr_consultation_paper.pdf, [Implementation of the Spectrum Pricing Review](#)

⁵ https://www.itu.int/ITU-D/tech/spectrum_management/docs/MODEL_FULL.pdf

Additionally, we recommend that all players, both local and international, be required to apply and pay for this license. Exempting new or international entrants from these requirements would create an uneven playing field, giving international operators an unfair advantage. To foster fair competition, the licensing requirements and fees should apply consistently to all operators in the South African market, supporting sustainable growth and competition within the industry.

Furthermore, if a user terminal licensee intends to provide services directly to end users, Paratus recommends that such a licensee be required to apply for an Electronic Communication Service (ECS) license. This requirement is essential for maintaining a fair playing field, as local operators are already obligated to hold an ECS license to offer direct-to-consumer services. Exempting user terminal licensees from this requirement would create an unfair competitive advantage, allowing certain operators to bypass compliance obligations that others must meet. Ensuring that all providers adhere to the same licensing standards is critical for promoting equity and regulatory consistency within the industry.

We also request clarity on whether the proposed model for user terminal fees is based on “items A-D” under the Gateway Earth Station License fee structure outlined in Question 5. Understanding if this model applies to user terminals as well will allow Paratus to plan and cost our operations accurately, ensuring that we can maintain service affordability and operational efficiency. For example, please see below the user terminal fees as per the **yellow** highlights in **Table 2**:

Item	Number of terminals	Fee per user terminal in Rands
A	$0 < n \leq 100$	2000
B	$100 < n \leq 1000$	500
C	$1000 < n \leq 10000$	200
D	> 10000	150

(Table 2: ICASA’s proposed user terminal fees based on the Gateway license fees)

In the event that the proposed user terminal fee is indeed based on the Gateway Earth Station license fee table, Paratus would like to propose the below **Table 3** for user terminal fees. This proposed structure is designed to reflect fair, proportional costs for user terminal deployments, supporting operational sustainability while ensuring reasonable contributions to the regulatory framework.

Item	Number of terminals	Fee per user terminal in Rands
B	$0 < n \leq 100$	500
C	$100 < n \leq 1000$	200
D	$1000 < n \leq 10000$	150
E	> 10000	100

(Table 3: Paratus’ proposed user terminal license fees)

Additionally, of particular concern is the user terminal licenses and its potential impact on the fee structure and Universal Service and Access Fund (USAF) contributions.

6.1 Fee Structure and USAF Contributions

There is some ambiguity around how the introduction of user terminal licenses will affect the existing fee structure, particularly regarding contributions to the Universal Service and Access Fund (USAF). Specifically, it is unclear whether the fees for user terminal licenses will be an additional annual payment on top of the current contributions, or if it will be integrated into the existing 0.2% of annual turnover that operators are required to contribute toward the USAF.

Paratus seeks clarity on this issue, as any additional fees could place a heavier financial burden on operators. If user terminal licenses require an extra annual payment, this could disrupt financial planning and significantly increase operational costs, potentially discouraging investment in satellite infrastructure, particularly in high-cost deployment areas.

If the fees for user terminal licenses are integrated into the existing 0.2 % annual turnover contribution, operators would be able to plan more effectively for their financial obligations, aligning with current regulatory practices. This integration would reduce the risk of overburdening operators, allowing them to focus their resources on expanding satellite coverage and improving service quality.

Recommendation: ICASA should provide clear guidelines on whether user terminal license fees will be additional payments or integrated into the existing USAF contribution. This clarification is essential for operators to plan their investments and operations effectively, minimising the risk of unexpected financial burdens.

6.2 New Operators' USAF Contributions

Paratus strongly advocates that all operators, including new entrants obtaining user terminal licenses, be required to contribute to the USAF, as existing licensees currently do. Exempting new players from this obligation would create an unfair competitive advantage, putting established operators at a disadvantage and potentially undermining the sustainability of the satellite industry.

For existing operators like Paratus, a lack of mandatory contributions from new entrants could result in reduced market share, as these new players would gain a cost advantage. This imbalance could adversely impact financial performance, potentially leading to job losses, reduced investments, and scaled-back expansion plans. Such disruptions could ripple through the entire satellite industry value chain, affecting suppliers, service providers, and other stakeholders, ultimately destabilising the sector.

Recommendation: To promote fairness and ensure sustainable industry growth, Paratus recommends that all licensees, including new entrants, contribute to the USAF. This approach will support socio-economic development, maintain industry stability, and help achieve South Africa's universal service objectives. Consistent contributions from all operators will ensure the USAF remains well-funded, supporting ongoing connectivity expansion in underserved regions.

Question 7: Kindly comment on the appropriateness of using Regulation 37 of the ICASA radio regulations to recognise ESIM licenses issued by other countries.

Paratus supports the use of Regulation 37 to recognise ESIM licenses issued by other countries, as this approach can streamline operations for ESIMs that enter South African territory. However, we seek clarity on the term “temporary” in this context to ensure there’s a shared understanding of how long such operations can continue under temporary status. Clear guidelines on this would help prevent any potential regulatory loopholes and maintain fairness for all operators.

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?

No comment.

Question 9: Please provide proposals on the role the satellite operator 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 underserved and unserved areas of the country.

As a leading satellite operator committed to bridging the digital divide, Paratus recognises the critical role that satellite technology plays in addressing the shortcomings of terrestrial networks. We are committed to supporting expanded broadband connectivity in South Africa’s unserved and underserved areas through satellite backhaul solutions. However, the success of such initiatives depends on a supportive regulatory and financial environment.

The Universal Service and Access Fund (USAF) is crucial in enabling broadband connectivity by financing infrastructure projects in areas where services would otherwise be uneconomical. This fund, managed by the Universal Service and Access Agency of South Africa (USAASA), is crucial for subsidising projects that expand connectivity, particularly in rural and remote regions. Contributions to the USAF from licensed operators, including Paratus, are intended to further the country’s universal access objectives.

To maximise the USAF’s impact, we believe it should be strategically directed to address connectivity gaps in areas where terrestrial networks are impractical. Satellite operators like Paratus are well-suited to provide backhaul for community networks, schools, healthcare facilities, and other essential services in rural areas. However, these deployments are costly, and without adequate support, they may not reach their full potential.

Paratus proposes that USAF funds be strategically allocated to subsidise rural satellite deployments, helping satellite operators extend services to the most remote areas and achieve national broadband coverage goals. We recommend that satellite-specific projects be prioritised for USAF funding to meet the growing connectivity needs where traditional infrastructure falls short.

To encourage satellite operators in addressing these connectivity gaps, Paratus suggests that ICASA and USAASA implement the following incentives:

1. **Subsidies:** We recommend introducing subsidies to incentivise satellite operators to invest in high-cost, low-return rural areas. These financial supports would alleviate some of the infrastructure and operational costs, enabling more effective deployment in underserved regions.
2. **Access to USAF for Satellite Operators:** Paratus advocates for direct access to USAF funds for satellite operators to support infrastructure deployment in underserved areas. Providing satellite operators access to these funds would reduce financial barriers and encourage investment in crucial connectivity projects.

Additionally, Paratus suggests that USAASA consider forming partnerships with satellite operators to share the costs of deploying satellite infrastructure in rural and underserved areas. This partnership model could include:

1. **Cost-Sharing for Rural Deployments:** USAASA could partner with satellite operators to co-finance rural deployments. By sharing the cost burden, USAASA would encourage more operators to expand their services into difficult-to-reach areas, ensuring that even the most remote parts of South Africa have access to broadband.
2. **Public-Private Partnerships (PPP):** Paratus believes that a Public-Private Partnership (PPP) model could be highly effective in expanding broadband coverage. In this model, satellite operators and USAASA would co-invest in infrastructure to ensure long-term sustainability and coverage in areas where private investment alone may not be sufficient.
3. **Subsidising User Terminals and Service Delivery:** USAASA could help subsidise the cost of satellite user terminals and the initial setup and maintenance of satellite services in rural communities. This would make satellite connectivity more affordable for end users and enable operators like Paratus to scale their services more rapidly.

Paratus is committed to helping South Africa achieve its universal broadband goals and sees satellite technology as a critical enabler in this mission. The Universal Service and Access Fund (USAF) must be leveraged more effectively to support satellite-based projects, especially in rural areas where terrestrial networks are insufficient. We believe that ICASA and USAASA should consider incentives such as subsidies or direct partnerships with satellite operators to ensure that the financial burden of rural deployments is shared.

By creating a regulatory environment that encourages satellite investment and utilising USAF to cover some of the costs, South Africa can achieve a more inclusive and connected society. Paratus is eager to work collaboratively with ICASA, USAASA, and other stakeholders to ensure that no region is left behind in the country's digital transformation journey.

4. Conclusion

ICASA’s proposed Satellite Licensing Framework represents a significant step forward in modernising South Africa’s satellite regulations. While Paratus recognises the opportunities presented by this framework, we emphasise that the regulatory environment must foster fair competition and ensure a level playing field for all operators. To achieve this, licensing requirements, spectrum fees, and compliance obligations must be consistent across the board, applying equally to both new entrants and established incumbents.

Paratus firmly believes that the rules should not disadvantage existing operators who have been supporting South Africa’s connectivity landscape through compliance and financial contributions. Creating a regulatory framework that allows certain players to bypass contributions or requirements would create an unbalanced market and harm incumbents who have committed resources to support the industry. For a sustainable satellite ecosystem, ICASA must ensure that all operators, regardless of their tenure in the market, adhere to the same standards when entering and operating in South Africa.

This approach aligns with Paratus’ commitment to promoting digital transformation and connectivity across South Africa and Africa. By fostering a fair, transparent, and competitive regulatory environment, ICASA can support a thriving satellite industry that encourages innovation, attracts investment, and contributes meaningfully to South Africa’s digital future.

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