

FISH HOEK VALLEY RATEPAYERS & RESIDENTS ASSOCIATION

(Incorporating Fish Hoek, Clovelly and Sun Valley)

~~Central Circle, Fish Hoek 7975~~

Web: <https://www.fhvrra.org.za/> Facebook: www.facebook.com/FHVRRRA/

Heritage Western Cape: Conservation Body

**TO: INDEPENDENT COMMUNICATIONS AUTHORITY OF SOUTH AFRICA
MR ELIAS LETLAPE AND MS TUMISHANG KHOMO
ELetlape@icasa.org.za AND TKhomo@icasa.org.za**

**SUBJECT: COMMENTS ON THE DRAFT AMENDMENT NUMBERING PLAN
REGULATIONS, 2016, IN ACCORDANCE WITH CHAPTER 11 OF THE
ELECTRONIC COMMUNICATIONS ACT, 2005 (ACT NO. 36 OF 2005)**

DUE: 11 MAY 2022

Fish Hoek Valley Ratepayers and Residents Association (FHVRRRA) is against the Independent Communications Authority of South Africa's (Icasa's) proposed tying biometric data of South Africans to their SIM cards. Surely, this is a violation of the POPI Act.

Our main concern is the possibility of identify theft of voice password, fingerprint mapping, facial recognition, retina scans or other biometric data that could be used as proof of a unique person, all linked to their phone number. With cellphones being used more for payments and fund transfers, a lost or stolen cellphone becomes an even greater security risk for individuals. Also, there is no mention of an encryption requirement and whether this biometric data can be transferred by near field communication (NFC) without authorisation.

We appreciate the Authority's concern when it is presented with mobile numbers that have potentially been hijacked either through a porting and / or a SIM swap transaction. The requirement for visiting a "phone shop" already seems to be standard procedure for porting / SIM swaps. However, storing biometric information on a SIM card might allow criminals to use the biometric data as proof that they are the person whose identify has been stolen.

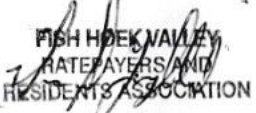
There is a huge trust issue with "phone shops" already. Making them responsible for collecting and linking biometric data with a subscriber number appears to be a step too far for subscribers to trust. Many suspect that their biometric data will be sold to criminals.

It is telling, is it not, that only eight percent of countries globally tie biometric data with SIM cards.

There is no specific mention of the initial on take requirement of biometric data from existing subscribers.

SUMMARY

In conclusion, the FHVRRA is against Section 6. Insertion of regulation 6A to the Regulations, 6.1 (5), (6), (8), (9) and (10).

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DATE	28 April 2022