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03 December 2021

Mr. Manyapelo Richard Makgotlho  
The Independent Communications Authority of South Africa,  
Dr Ivy Matsepe-Casaburri Building,  
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Dear Sirs

#### **INQUIRY ON RF PLANNING AND IMT ROADMAP**

1. It has just come to our attention that the Independent Communications Authority of South Africa ("the Authority") has published a notice on the inquiry for the implementation of the Radio Frequency Migration Plan and of the International Mobile Telecommunications (IMT) Roadmap ("the Inquiry") for consultation in terms of section 4B of the Independent Communications Authority of South Africa Act, 2000 (Act No. 13 of 2000).
2. We wish to submit, right at the onset, that we believe, for the reasons we will outline below, that migrating us from the band in which we have been assigned radio frequency spectrum would be plausible or further the fundamental aim of the Authority of regulating the industry in the public interest.

3. We, Mthinte Communications (Pty) Ltd (“**Mthinte**”), were assigned 60MHz spectrum on a secondary and sharing basis in the 3600MHz – 3800MHz band on 08 April 2021 by the Authority with the conditions that 20MHz and 40MHz are to be shared on a coordinated basis with one (1) incumbent operator and one (1) other assignee, namely Rain and One Telecoms respectively.
4. Upon commencing planning of our network rollout, we started talking to the two above mentioned licensees for purposes of coordination and potentially sharing of spectrum and/or infrastructure.
5. Our discussions with Rain culminated in us reaching an agreement of sharing our respective spectrum and Rain’s infrastructure.
6. We have a plan to grow our network by 60% of what it is now with an investment of +/- R60billion rand over ten (10) years.
7. For this sharing agreement we, Mthinte have committed R200million per annum which translates to R2billion in a period of ten (10) years, which is the duration of the agreement to which we have committed.
8. Apart from committing to spend that money to the infrastructure usage, we stand to take services to more than two million (2000,000) users in the next five (5) years.
9. We, as a company will experience unprecedented growth in this industry.
10. Our partners will also experience some growth which is an inevitable benefit of collaboration in this industry of ours.
11. We therefore submit that all these positive aspects of us holding the spectrum in 3.7GHz band; namely making industry a little more inclusive, facilitating the entry of new SMMEs in the main stream industry, bridging of the digital divide for some communities who are currently under served, investment of billions of rands in the industry, more taxes to the fiscus, etc. would be in jeopardy if we were to be migrated to a different band in which we might not have similar partners to speed up our entry in the market. And cancellation of our current sharing agreement would mean that all the spectrum fees paid would go to waste as fruitless expenditure.
12. On the basis of the foregoing we submit, with respect, that we do not support the migration of telecoms operators from 3600MHz – 3800MHz band.

13. We are sincerely grateful for the opportunity to submit our views on this matter

Thank you.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Vusi Ndlovu', written in a cursive style.

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**Vusi Ndlovu**

**CEO**

**Mobile: 082 444 0739**