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To: The Independent Communications Authority of South Africa
For the attention of: Mr Mandla Mchunu, Project Manager

By email to: RRamendments@icasa.org.za
Copied to: mmchunu@icasa.org.za

24 June 2026

Re: Written representations on the Draft Amendment of the Radio Frequency Spectrum Fees Regulations, 2010 (Notice 3926 of 2026, Government Gazette No. 54677, 15 May 2026)

Dear Mr Mchunu,

Myriota Pty Ltd (“Myriota”) welcomes the opportunity to make written representations to the Independent Communications Authority of South Africa (“the Authority”) on the Draft Amendment of the Radio Frequency Spectrum Fees Regulations, 2010, published as Notice 3926 of 2026 in Government Gazette No. 54677 on 15 May 2026 (“the Draft Fees Regulations”). Myriota participated in the Authority’s Inquiry into the Licensing Framework for Satellite Services, and is grateful for the continued opportunity to contribute to the development of South Africa’s satellite regulatory framework.

Myriota is a provider of low cost, low power, secure, direct to orbit satellite connectivity for the Internet of Things (“IoT”). Founded in Adelaide, South Australia, Myriota holds a portfolio of more than one hundred granted patents and achieved the first transmission of IoT data directly to a nanosatellite in 2013. Myriota’s networks serve large volumes of low-power machine to machine (“M2M”) and IoT terminals for civil applications such as agriculture, utilities, environmental monitoring, logistics and infrastructure management, frequently in remote and underserved areas. Myriota is a commercial satellite operator. It is not a military or governmental entity, and it is not a provider of security services.

These representations are confined to two matters arising under the Draft Fees Regulations:

- (a) the proposed blanket licensing of satellite terminal networks; and
- (b) the application of the security factor to civil IoT and M2M operators.

Myriota does not, in this submission, address the remaining provisions of the Draft Fees Regulations.



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1. Support for the blanket licensing of satellite terminal networks

1.1 Myriota strongly supports the Authority's proposal, in the substituted regulation 5(5)(e), to license satellite terminal networks under a blanket licence by reference to the Satellite Terminal Network Formula ($\text{Fee} = \text{UNIT} \times \text{BW} \times \text{SEC}$), calculated on the basis of the uplink bandwidth of the terminals.

1.2 Myriota particularly welcomes that the fee under this formula is determined by reference to uplink bandwidth and is independent of the number of terminals connected to the network. This is the appropriate basis on which to authorise IoT and M2M satellite networks. Such networks are characterised by very large volumes of low power, low data terminals that are individually of negligible spectral significance, but that collectively deliver substantial social and economic benefit.

1.3 A bandwidth-based fee that does not vary with the number of terminals offers several advantages that Myriota respectfully commends to the Authority:

- (a) it removes the administrative burden, for both the Authority and operators, of authorising terminals individually, and thereby accelerates deployment and market entry;
- (b) it keeps connectivity affordable and scalable, which is essential to extending IoT and M2M services to remote, rural and underserved areas, where such services deliver the greatest public benefit;
- (c) it provides certainty and predictability as to the cost of operating a network, which supports long term investment planning; and
- (d) it is technology neutral and consistent with international best practice and with the Open-Sky approach to satellite connectivity that the Authority has adopted.

1.4 Myriota also welcomes the extension of the formula to apply to any satellite terminal network, rather than only to a very small aperture terminal ("VSAT") network. This extension ensures that the framework remains technology neutral and accommodates emerging satellite technologies, including direct to orbit IoT connectivity, while preserving the principle that the network licence, rather than the individual terminal, is the subject of authorisation.

1.5 For these reasons, Myriota supports the substituted regulation 5(5)(e) as drafted, and encourages the Authority to retain in the final regulations the quantity independent, uplink bandwidth basis of the Satellite Terminal Network Formula.

2. Application of the security factor to civil IoT and M2M operators

2.1 The substituted satellite formulas in regulation 5(5)(d) and regulation 5(5)(e) introduce the security factor (SEC) into the calculation of satellite spectrum fees. The accompanying explanatory



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memorandum explains that the security factor is introduced to benefit satellite operations in the security sector.

2.2 Myriota understands that the security factor is provided for in the Radio Frequency Spectrum Fees Regulations, 2010, as amended, and that it operates by reference to the type of licensee, providing a reduced factor to licensees that provide services in the security sector. Myriota further understands that a licensee which does not provide security services is subject to a security factor of 1, being the neutral value that leaves the fee unchanged. Myriota supports the policy of providing a reduced security factor to the security sector, and does not oppose it.

2.3 As a commercial satellite operator that is neither a military nor a governmental entity, and that is not a provider of security services, Myriota understands that it falls within the category of licensees that are not security services, and that the security factor applicable to it is accordingly 1. Certainty that a civil IoT and M2M operator is subject to a security factor of 1 underpins the affordability of low cost satellite connectivity for the remote and underserved areas that such connectivity is intended to serve, and is therefore of considerable importance to Myriota.

2.4 Myriota's concern in relation to the security factor is one of certainty. The Draft Fees Regulations introduce the security factor into the satellite formulas in regulation 5 without restating, within those formulas, the value of the factor or a cross reference to the provision of the principal regulations in which the security factor is defined and valued. To remove any interpretive uncertainty, Myriota respectfully requests that the Authority:

- (a) confirm, whether in the regulations or in the accompanying explanatory memorandum, that civil IoT and M2M satellite operators that are neither military nor governmental entities, and that are not providers of security services, fall within the category of licensees that are not security services, and are therefore subject to a security factor of 1; and
- (b) include, within the substituted regulation 5(5)(d) and regulation 5(5)(e), an express cross reference to the provision of the principal regulations in which the security factor and its values are set out, so that the value of the security factor applied in the satellite formulas is unambiguous.

2.5 The clarification requested in paragraph 2.4 would involve no change of policy and no cost to the Authority. It would, however, enhance the transparency and predictability of the fee framework, which are important to attracting and sustaining investment in satellite IoT connectivity in South Africa.

3. Conclusion

3.1 Myriota supports the Authority's adoption of a blanket, bandwidth-based licensing approach for satellite terminal networks, and respectfully requests only the limited clarification set out in



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paragraph 2.4 in relation to the security factor. Myriota would welcome the opportunity to engage further with the Authority on these matters.

3.2 Should the Authority elect to hold public hearings on the Draft Fees Regulations, Myriota would welcome the opportunity to make oral representations.

3.3 This submission contains no information that Myriota requests be treated as confidential.

Yours faithfully,

Yulia Kulikova

Director of Regulatory Affairs
Myriota Pty Ltd
[Redacted Signature]