29 June 2026

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

Submitted via email: RRamendments@icasa.org.za and copied to mmchunu@icasa.org.za

RE: Skylo Technologies Written Representations regarding the Draft Amendment of the Radio Frequency Spectrum Fees Regulations, 2010 (Notice 3926 of 2026) and the Draft Amendment of the Radio Frequency Spectrum Regulations, 2015 (Notice 3927 of 2026)

Dear Chairperson:

Skylo Technologies Inc. (Skylo) appreciates the opportunity to provide comments to the Independent Communications Authority of South Africa (ICASA) regarding the Draft Amendment of the Radio Frequency Spectrum Fees Regulations, 2010 (Notice 3926 of 2026) and the Draft Amendment of the Radio Frequency Spectrum Regulations, 2015 (Notice 3927 of 2026). Skylo commends ICASA for the progressive and forward-thinking regulatory approach reflected in these draft amendments. Specifically, Skylo welcomes the introduction of a Blanket Licence framework for satellite terminals, the transition to calculating spectrum fees based on bandwidth rather than on a per-terminal basis, and the establishment of a Foreign Satellite Space Segment Registration mechanism that enhances transparency while avoiding undue market-entry barriers.

The Draft Fees Amendment, through its definition of a "Blanket Licence" as an authorization covering an unlimited number of terminals and the introduction of the Terminal Network Fee formula (Fee = UNIT × BW × SEC), represents a significant and commendable policy achievement. ICASA's determination is fully aligned with an "Open-Sky" policy, where fees are appropriately calibrated to assigned uplink bandwidth rather than the volume of deployed user terminals. This framework is vital for Non-Terrestrial Network (NTN) direct-to-device ("D2D") services like Skylo's, which utilize 3GPP-standard devices, including smartphones, wearables, and IoT devices, to connect seamlessly to satellite networks. As D2D NTN technology scales to millions of consumer devices, anchoring fees to bandwidth supports a regulatory environment that is technology-neutral, predictable, and investment-friendly.

Furthermore, Skylo commends ICASA for proposing the Foreign Satellite Space Segment Registration within the Radio Frequency Spectrum Regulations, 2015. This registration requirement, structured as a straightforward process with no administrative fee, strikes an appropriate balance between regulatory oversight and market accessibility. As noted by ICASA, the registration aims to promote transparency regarding satellite operators serving South Africa and facilitate direct communication for the rapid resolution of interference or security concerns, all without imposing additional burdens on market entry. Skylo strongly supports this light-touch regulatory approach.

Collectively, these draft amendments represent a meaningful step forward in South Africa's approach to satellite regulations. Skylo appreciates the opportunity to contribute to these proceedings and remains committed to supporting ICASA's mission of ensuring that all people of the Republic of South Africa have access to affordable, reliable, and universal communication services.

Sincerely,

Mindel De La Torre
Head of Global Regulatory Affairs
Skylo Technologies, Inc.
[redacted]

Natcha Techachainiran
Director of Regulatory Affairs
Skylo Technologies, Inc.