

Telkom

Draft Rapid Deployment Regulations, 2026

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Telkom SA SOC Limited



Introduction

Key message:

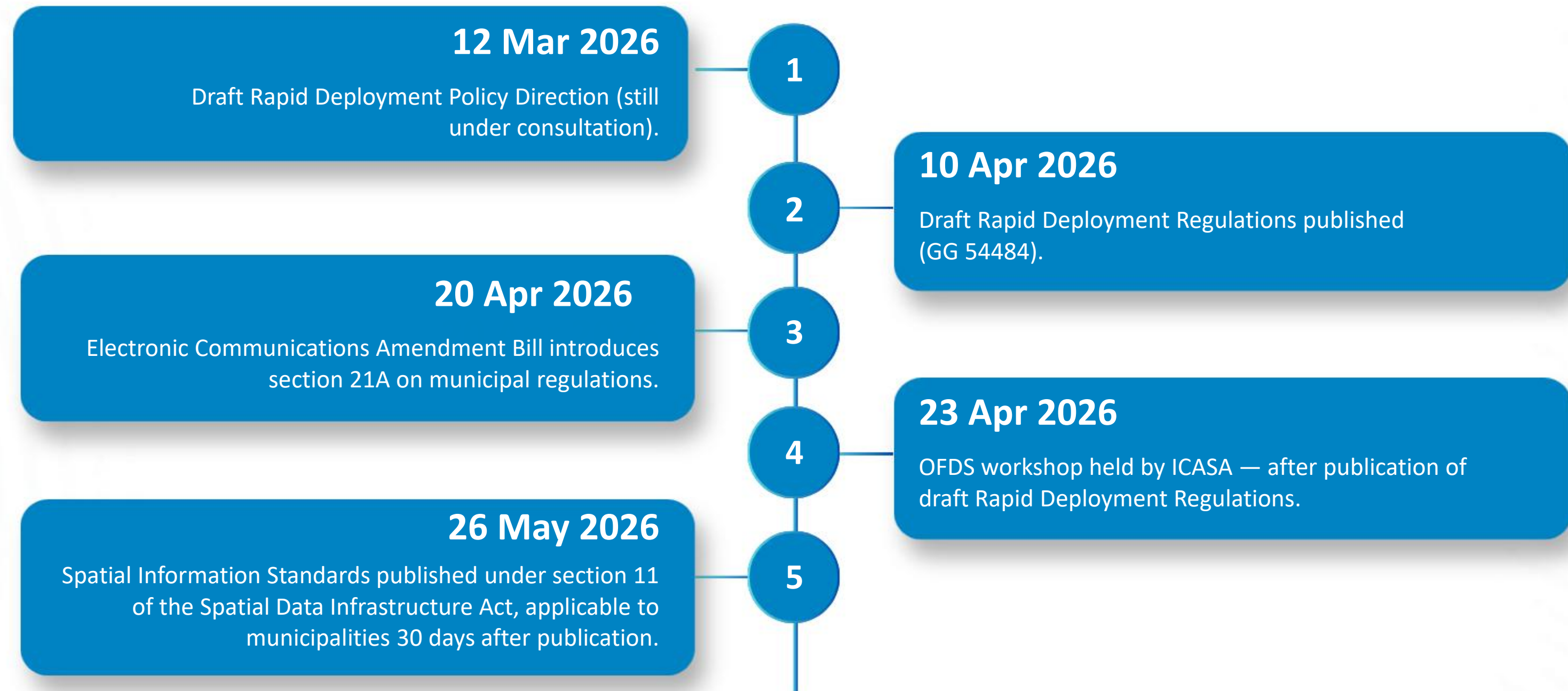
Telkom supports rapid deployment but warns that the draft Regulations, if finalised now, risks duplication, legal uncertainty, and slower deployment.

- Telkom appreciates the opportunity to engage ICASA.
- Supports the objectives of section 21 of the ECA.

Key concerns:

- Timing and alignment with ongoing policy and legislative processes.
- Need for a harmonised national framework.

Context: A Rapidly Changing Policy Environment



Telkom's Three Core Themes

1

Need for harmonised policy
and regulatory framework

2

Better coordination among
all stakeholders

3

Careful implementation of
GIS and OFDS

Theme 1: Harmonised Policy & Regulatory Framework

Multiple overlapping instruments

- Spatial Planning and Land Use Management Act (SPLUMA)
- Infrastructure Development Act (IDA)
- RDP (2023)
- Standard Draft By-laws (2023) (adoption 4/257)
- Draft Policy Direction (2026)
- Amendment Bill (2026)
- Spatial Information Standards for municipalities (May 2026)
- Spatial Data Infrastructure Act (2003)

Draft Regulations risk misalignment with:

- Minister of COGTA's powers over municipalities
- Minister of DCDT's proposed policy directions
- Municipal land use frameworks

Only four municipalities have adopted the Standard Draft By-laws.

Theme 1 (continued): Risks of Proceeding Now

1

ECA Amendment Bill

ECA Amendment Bill may fundamentally reshape municipal access rules.

2

Draft Policy

Draft Policy Directions proposes to expand ICASA's role into wayleave oversight and verification.

3

Risk of duplicate

Risk of duplicate processes for ECNS licenses.

4

Potential for conflicting

Potential for conflicting dispute resolution mechanisms.

Theme 2: Coordination Failures Slow Deployment



2016 ICT Policy White Paper identifies coordination failures amongst government departments as a major barrier.



Municipal processes remain expensive, inconsistent, slow, and often opaque.



Lack of alignment between ICASA Rapid Deployment Regulations and municipal by-laws creates uncertainty.



There is a need for a harmonised national framework for land access.

Theme 2 (continued): Avoiding Duplication

Policy alignment

- Draft Regulations should harmonise dispute resolution.
- Standard Draft By-Laws already impose similar obligations.

Risk of parallel systems

- Two parallel systems = delays, confusion, and higher costs.

Telkom recommends

- ICASA + DCDT + COGTA jointly enforce adoption of Standard Draft By-laws.
- ICASA should avoid duplicating municipal processes.

Theme 3: GIS Database & OFDS

Overview

- Telkom supports GIS and OFDS for spatial data sharing.
- Faster planning
- Reduced duplication
- Improved coordination

Risks

- Network security exposure
- Competition concerns in co-build scenarios
- Legacy data gaps
- High cost of compiling accurate datasets

Theme 3 (continued): Practical Recommendations

1

Phase adoption

OFDS adoption should be phased and voluntary, not mandatory.

2

Align municipalities

Municipalities must also adopt OFDS for benefits to materialise.

3

Prefer federated GIS

ICASA should avoid centralised GIS; consider federated/linked databases.

4

Keep co-build commercial

Co-build should remain commercially driven, not compulsory.

Key Divergences: Regulations vs Standard Draft By-laws

Coordination
responsibilities

Public participation
requirements

Reinstatement and
property protection
obligations

Dispute resolution
mechanisms

Result:
duplicate work for
licensees

Telkom's Recommendations to ICASA

1. Pause finalisation

Until the Amendment Bill and Policy Direction are concluded.

3. Avoid duplication

Respect COGTA's jurisdiction over municipal processes.

5. Promote co-build

Keep it commercially driven, not mandatory trench sharing.

2. Align frameworks

With Standard Draft By-laws and SPLUMA, Spatial Data Standards

4. Adopt a phased OFDS approach

With strong security safeguards.

6. Use one national framework

For land access and dispute resolution.

Conclusion

Telkom supports rapid deployment and modernisation.

Rapid Deployment Regulations must not create new bottlenecks.

Harmonisation is essential to unlock faster, cheaper, more efficient deployment.

Telkom is ready to collaborate with ICASA, DCDT, COGTA, SALGA, and industry.

Telkom

THANK
YOU.



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