



Wireless Access Providers' Association of South Africa
www.wapa.org.za

3 December 2021

Independent Communications Authority of South Africa

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WAPA SUBMISSION ON THE INQUIRY FOR THE IMPLEMENTATION OF THE RADIO FREQUENCY MIGRATION PLAN AND OF THE INTERNATIONAL MOBILE TELECOMMUNICATIONS ROADMAP

Introduction

1. The Wireless Access Providers' Association of South Africa ("WAPA") welcomes the opportunity to participate in the process outlined by the Authority's notice on the inquiry for the implementation of the Radio Frequency Migration Plan and of the International Mobile Telecommunications (IMT) Roadmap¹ ("the Notice").

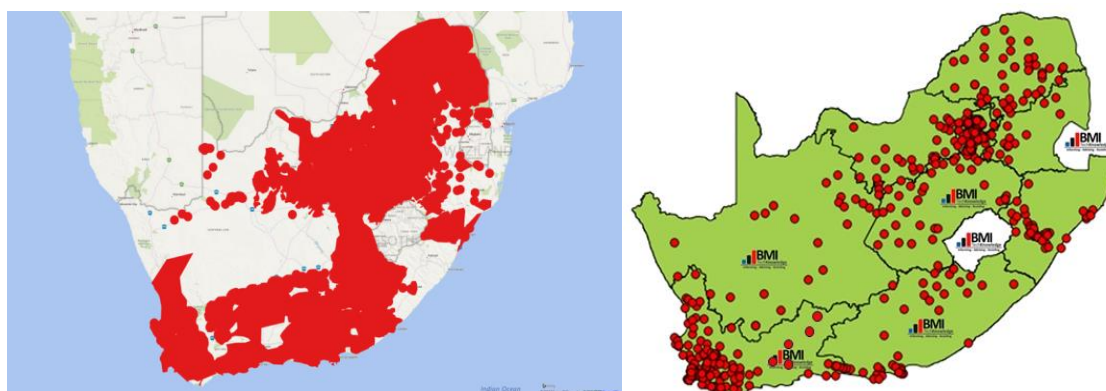
About WAPA

2. WAPA was formed in 2006 as a non-profit organisation representing the interests of Wireless Internet Service Providers ("WISPs") in both urban and rural locations in South Africa.
3. WAPA promotes technical and business best practices for fixed wireless deployment and engages in policy work to promote efficient and equitable spectrum allocation and assignment, wholesale service provision and SMME enablement.
4. WAPA currently represents more than 220 organisations, encompassing both large and small operators, as well as supporting industries such as equipment vendors and software providers with a 2021 census

¹ General Notice 580, Government Gazette 45247, published 30 September 2021

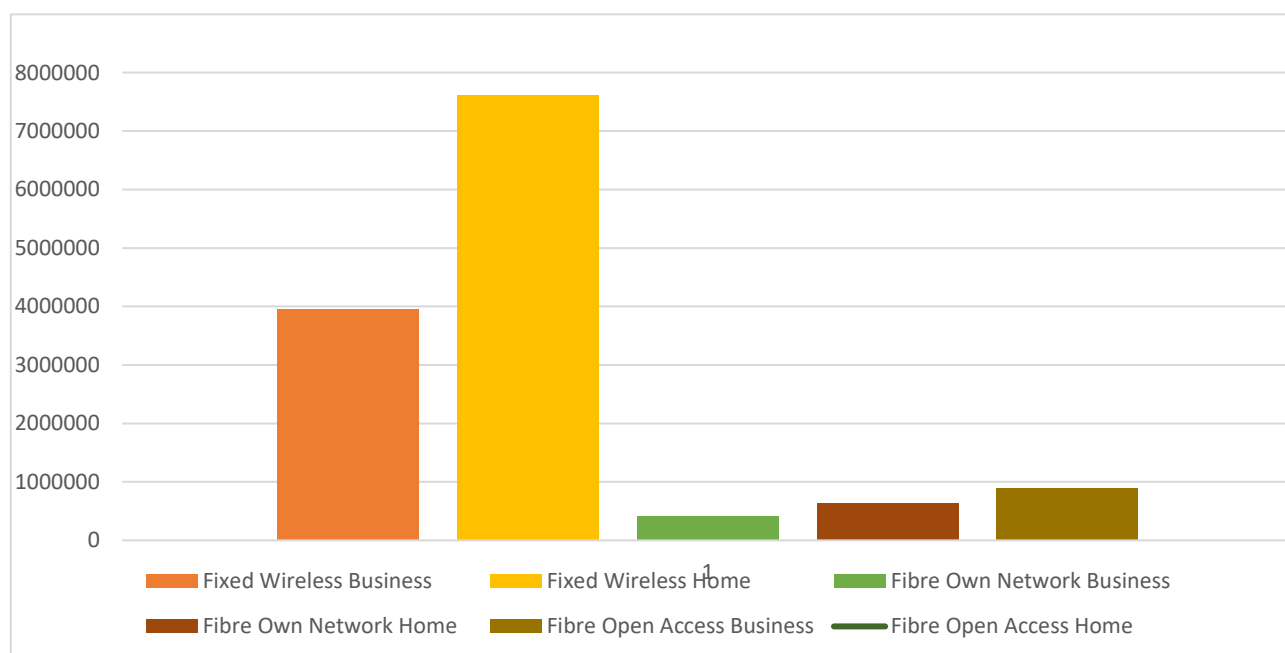
indicating that WAPA’s membership employs approximately 3 600 individuals, owns and/or operates 5 700 high sites servicing 350 000 customers generating annual revenues in excess of R3.2 Billion.

5. WAPA’s members predominantly operate in peri-urban and rural areas which often lack affordable and/or reliable access to broadband Internet.



(Figure 1 – coverage map and member location – 2018 census)

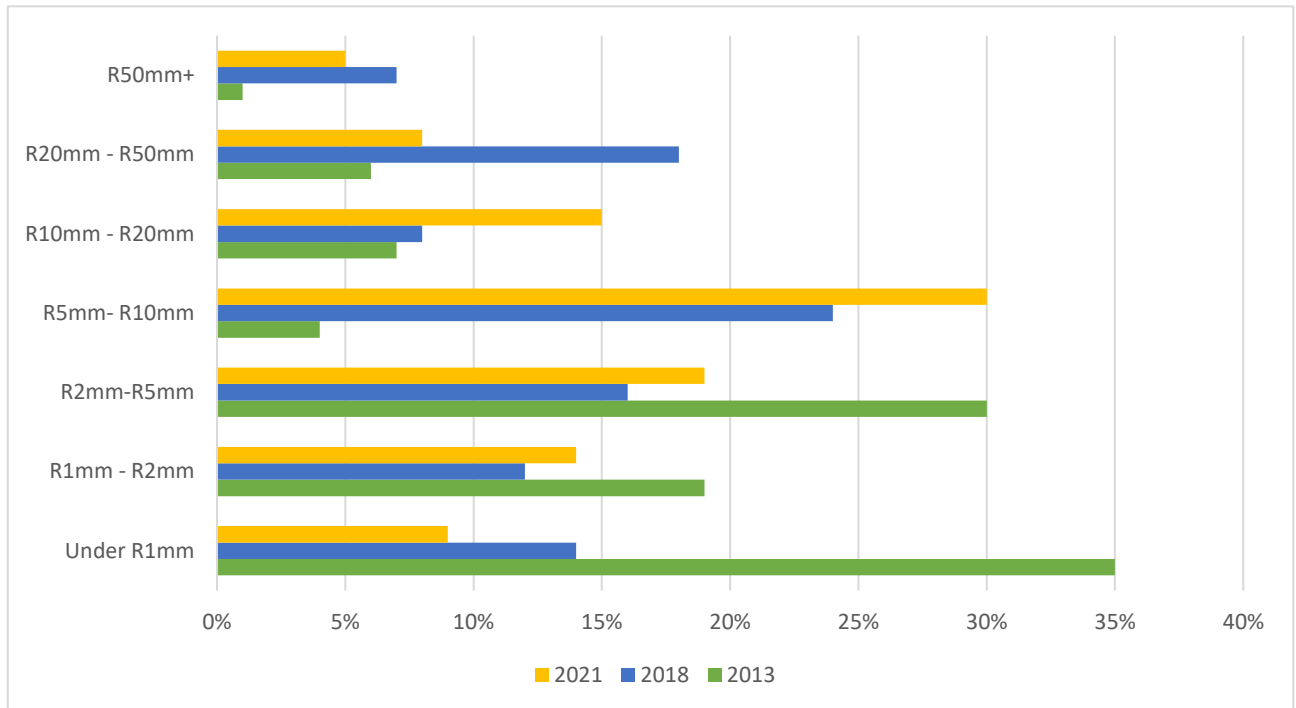
6. WAPA’s members provide a variety of predominantly retail services, incorporating:
 - 6.1. Access services: WISPs build and operate fixed wireless – and sometimes wired – connections directly to homes and businesses throughout South Africa; and
 - 6.2. Backhaul services: WISPs build and operate the long-distance networks which link remote areas to the communications infrastructure of larger operators.



(Figure 2 – Revenue by Connection Type – 2021 census)

7. The Authority’s findings in the 2021 “The State of the ICT Sector Report in South Africa” suggest that WAPA’s membership accounts for 67% of the revenue generated from fixed wireless.

8. WAPA members have a proven track record of price reduction and service innovation in the provision of broadband services to areas which, as a consequence of perceived commercial non-viability, have been largely neglected by the large operators.
9. Notwithstanding the challenges of the market in which they operate WAPA's membership has enjoyed modest growth over the lifetime of the organisation:



(Figure 3 – Membership Revenue Distribution– 2021 census)

10. WAPA works to promote a model of community-based SMMEs covering small areas and interconnecting with each other to achieve ubiquitous coverage. This fosters job creation and skills development and transfer, and results in deepening broadband penetration in South Africa through local networks developed to serve local environments.
11. In light of continued growth within the industry WAPA has found itself in the position to provide support in the form of training and mentorship for youths, subsidies for black-owned WISPs looking to become WAPA members and, latterly, cash flow support for WISPs providing COVID-19 disaster relief in rural areas. WAPA also has a mentorship programme for new black-owned WISPs to enable fast deployment of their networks, often in under-serviced areas.
12. WAPA sets out its submissions in respect of the two key aspects contemplated by the Notice below:

Category 1 Bands

13. Several allocations falling within the “Category 1 – Frequency bands for other Radiocommunications Services” questionnaire are utilised by WAPA's membership in the provision of their services.

14. The Authority is referred to Annexure A which aggregates the responses received from WAPA's membership.

Category 2 Bands

15. Save to note that WAPA's membership does not currently operate in any of the 14 category 2 bands which may be considered for IMT services it has no further submissions in this regard.

Conclusion

16. WAPA extends its appreciation to the Authority for its consideration of these comments and trusts that they will be of assistance to the Authority.

17. Should the Authority elect to conduct public hearings, workshops or further engagements WAPA wishes to note its interest in further participation.

Regards,



Paul Colmer

o.b.o **WAPA EXECUTIVE MANAGEMENT COMMITTEE**