



Wireless Access Providers' Association of South Africa

www.wapa.org.za

25 April 2026

Independent Communications Authority of South Africa

Attention: Chairperson: Rapid Deployment Council Committee

Block C 350 Witch-Hazel Avenue Centurion 2146

Per email: RapidDeployment@icasa.org.za

WAPA SUBMISSION ON DRAFT REGULATIONS ON RAPID DEPLOYMENT OF ELECTRONIC COMMUNICATIONS NETWORKS AND FACILITIES, 2026

Introduction

1. The Wireless Access Providers' Association of South Africa ("WAPA") welcomes the opportunity to comment on the Authority's **DRAFT REGULATIONS ON RAPID DEPLOYMENT OF ELECTRONIC COMMUNICATIONS NETWORKS AND FACILITIES, 2026**
2. WAPA supports the objectives outlined in the regulation and wishes to note its support and appreciation of the Authority's efforts to date.

About WAPA

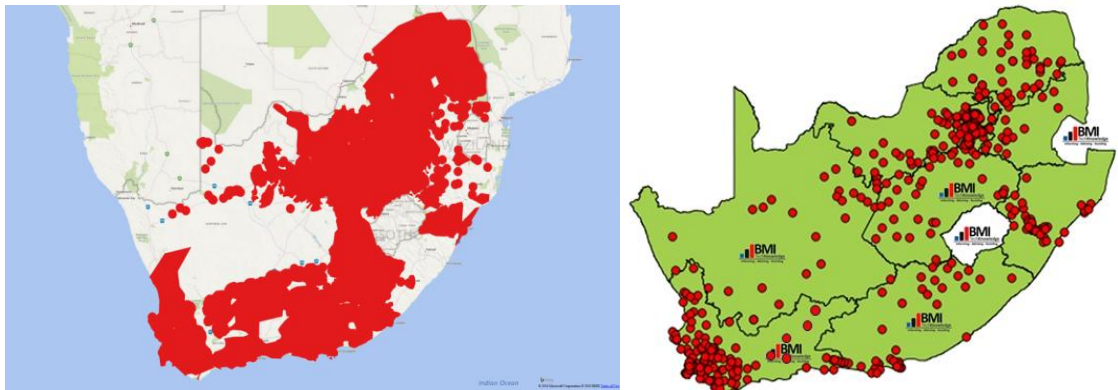
3. WAPA was formed in 2006 as a non-profit organisation representing the interests of Wireless Internet Service Providers ("WISPs") in both urban and rural locations in South Africa.
4. WAPA promotes technical and business best practices for fixed wireless deployment and engages in policy work to promote efficient and equitable spectrum allocation and assignment, wholesale service provision and SMME enablement.

www.wapa.org.za | Tel: +27 86 069 9272
7 Houlton Dr, Palm Beach, Kwa Zulu Natal, South Africa 4265

Management Committee:
Johan Botha (Chairperson),
Paul Colmer, Riyaz Kerbelker, Tim Genders, Sthembiso Dlamini, Jackie Momberg, Tauriq Brown
Lesley Colmer (CEO).

WAPA is an Association not for Gain currently registered under the Non-Profit Organisations Act.
Registration No: 58-776-NPO VAT number: 445 027 1582

5. WAPA currently represents more than 250 organisations, encompassing both large and small operators, as well as supporting industries such as equipment vendors and software providers. The majority of WAPA's membership holds Class electronic communications service and Class electronic communications network service licences.
6. WAPA's members predominantly operate in peri-urban and rural areas which often lack affordable and/or reliable access to broadband Internet. As a class, WISPs serve to drive down the cost to communicate and increase broadband penetration.



(WAPA 2024 census – coverage map and member location)

WAPA members have developed extensive experience in rolling out low-cost connectivity fixed wireless broadband access (typically under R500 per month uncapped fixed wireless Internet access) and public hotspots @ R5 per day uncapped to subscribers across South Africa.

7. WAPA members provide both:
 - 7.1. Access services: WISPs build and operate fixed wireless – and sometimes fibre – connections directly to homes and businesses throughout South Africa; and,
 - 7.2. Backhaul services: WISPs build and operate the long-distance networks which link remote areas to the communications infrastructure of larger operators.
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 neglected by larger operators.
9. In light of continued growth within 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.
10. WAPA notes the areas of concern listed within the draft, namely;
 - 10.1. Inconsistent and unpredictable municipal wayleave processes

WAPA notes this and is also aware of inconsistencies in within the area of “Aerial vs fibre wayleaves” where certain municipalities will refuse a licenced provider access to an aerial Wayleave but grant only a trenched wayleave, which is more expensive and renders the project rollout financially not feasible, only to grant an aerial wayleave to another provider.

10.2. Excessive, non-cost-based application fees and deposits;

WAPA notes this and would like to bring to the authorities attention that some municipalities are charging an annual maintenance fee for a wayleave where no maintenance of the wayleave is required by the issuing municipality.

10.3. long approval timelines across state entities;

10.4. Difficulties accessing state-owned servitudes and infrastructure;

10.5. Wayleave “hoarding” or speculative applications;

WAPA believes that a similar approach be looked at as with spectrum on a “use it or loose it” policy whereby any wayleave issued will have a time frame where deployment must commence or the wayleave be withdrawn.

10.6. Lack of visibility of existing infrastructure, contributing to duplication and accidental damage;

WAPA supports the development of a GIS database in this regard and attended the Open Fibre Data Standards workshop hosted jointly by ICASA and the Internet Society. Such a database is a crucial tool for attracting investment and receiving finance for access build projects and to manage overbuilds.

Theoretically this information exists within the municipalities as the fibre routes were specified in the Wayleave applications but is inaccessible or not maintained in any usable form. Municipalities are actively encouraging overbuilds as wayleave fees are a revenue source, the extent of this problem is that in certain areas we have 4 or more FNO’s trenching on top of each other and inevitably causing damage to each other. This is compounded by the lack of communication and record keeping within municipalities internally when repairing other services such as water, sanitation and power.

WAPA strongly believes that the key problems in rapid deployment are the municipal issues with wayleaves, town planning, rezoning, inconsistent pricing and time frames.

- inconsistent and unpredictable municipal wayleave processes;
- excessive, non-cost-based application fees and deposits;

- long approval timelines across state entities;
- difficulties accessing state-owned servitudes and infrastructure;
- wayleave “hoarding” or speculative applications;
- lack of visibility of existing infrastructure, contributing to duplication
- and accidental damage;
- unclear expectations around landowner engagement; and
- absence of a structured dispute-resolution pathway for property-related conflicts.

WAPA strongly believes that the key problems in rapid deployment are the municipal issues with wayleaves, town planning, rezoning, inconsistent pricing and time frames.

WAPA believes and supports universal affordable connectivity for all in line with government objectives and the main area of concern is within the underserved rural and semi-rural areas where the inefficiencies, time frames and costing is increasing the cost of deployment and slowing down the rollouts.

There are various connectivity mediums that are used in South Africa, mainly fibre, fixed wireless, mobile cellular and satellite. Fibre can probably only access 50% of the population in 20% of the land mass. Satellite is the ultimate rapid deployment for underserved areas but remains unaffordable to the majority. Mobile cellular has reach into these areas from the MNO's but remains unaffordable on prepaid models. Fixed wireless and public WiFi hotspots using unlicensed spectrum is key to servicing the rural and semi-rural areas. To put this into perspective of affordable rapid deployment we require municipal hurdles to be broken down to allow us to get fibre backhaul to remote nodes where we can extend wirelessly into these remote areas.

Unlicensed Spectrum opportunity

If we are to pursue the goal of universal 100Mbps affordable internet access for all in these underserved areas we need more unlicensed spectrum so cover the 80% of land mass that fibre cannot reach. The particular spectrum band suited to this is the upper 6GHz band and if issued for unlicensed use in standard power WiFi we will have the tools to complete the task.

Conclusion

WAPA members are strategically placed to give a national footprint of coverage and roll out rapidly if we can get past these hurdles. We look forward to further engagement on these matters.

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

Lesley Colmer

CEO WAPA