



1. Executive Summary

World Mobile welcomes the publication of ICASA's Draft Regulations on Dynamic Spectrum Access (DSA) and Opportunistic Spectrum Management. We strongly support the Authority's objectives to:

- Expand broadband access to rural and underserved communities
- Encourage participation from non-dominant players, SMMEs, and community networks
- Promote innovation through dynamic spectrum sharing

Our submission shares field-based insights, particularly from rural test deployments leveraging TV White Space (TVWS) and low-cost connectivity architectures that align with ICASA's proposed framework.

2. General Support for the Regulations

We commend ICASA's holistic approach, including:

- The use of Unified Spectrum Switch (USS) systems for dynamic management
- Clear provisions for Master and Client device roles
- Technical thresholds that balance innovation with protection of incumbents
- Recognition of the importance of rural-specific parameters (e.g., relaxed power limits, greater channel aggregation)

3. Operational Case Studies and Alignment with ICASA's Goals

World Mobile has executed rural broadband pilots using TVWS and hybrid backhaul (including Starlink) in:

- **Chitar, Mozambique** – Serving a school and surrounding village of ~500 residents
- **Zanzibar** – Supporting over 350 B2B clients with locally managed wireless infrastructure



These deployments demonstrate:

- Safe operation below incumbent interference thresholds
- Geo-location-enabled devices compatible with USS-like systems
- Efficient rural spectrum use with minimal infrastructure

4. Recommendations and Observations

While we support the proposed framework, we recommend:

- **Expanding eligibility to include license-exempt pilot projects** as an incubation mechanism for underserved areas
- **Allowing limited initial access to spectrum (e.g., in rural areas) prior to full USS integration**, subject to safeguards
- **Recognition of sub-GHz TVWS deployments** as complementary to ISFR1 and ISFR2, expanding rural reach
- **Incentivising local assembly and deployment partners** to meet device type approval and labelling requirements

5. Conclusion

World Mobile supports ICASA's pioneering efforts and is prepared to collaborate on trials, standards validation, and USS framework evolution. We appreciate the opportunity to provide input and look forward to participating in oral hearings.
