



ICT TRADING ENTERPRISES CC 11th June 2020

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Windhoek

Namibia

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Re: Comments in respect of the license to the municipal Council for the municipality of Windhoek

In response to the recent CRAN notice for public comments on the reconsideration of the ECNS / ECS licensing to the COW.

We would like to add support to the upholding of this award. Firstly, we do not see any legal reasons why the COW should not be granted this license, further the COW has an obligate to deliver certain services to its residents that in the era of the digital age include digital services.

That when considering the social economic inequality of Windhoek, and in deed Namibia as a whole, the COW should not stand by idly and only provide service to resident that have the fortune to live in a connected area or have a sufficient disposable income to pay for the privilege of access.

In short, should the CoW be empowered to,

1. Provide digital services to municipal buildings and public libraries?
2. Provide alternate means of access to low income areas?
3. Establish public Wi-Fi hotspots, possibly at commuter areas such as bus stops, railway station, and marketplaces?
4. Free internet in the city in buildings such as libraries and satellite offices, yes.
5. Affordable internet at a set contention ratio of 50:1 or more for government citizen housing projects, yes.

Managing Member & Director: Mr. Lazarus Paulus

6. Affordable internet at bus stops, railway station, yes

7. Be in direct competition with civilian operators, no

8. Capital for the project must come from National Government or the Universal Access monies that is available.

9. Maintenance of service to be derived from advertising and not from capital acquired through rates and taxes.

In Our opinion the answer is yes, the authority has made the right decision.