

16 June 2020

Attention:

Mrs. Emilia Nghikembua  
Head: Legal Advice  
CRAN

**COMMENTS ON THE APPLICATION FOR RECONSIDERATION IN RESPECT TO THE AWARD OF  
LICENSE TO THE MUNICIPALITY OF WINDHOEK**

Further to the public notice by CRAN on the application for the reconsideration in respect to the award of license to the municipality of Windhoek, ISOC Namibia hereby submits its comments on the matter.

The Internet Society was founded in 1992 by a number of people involved with the Internet Engineering Task Force (IETF). ISOC Namibia was officially established in November 2017 as a Namibian not-for-profit association with the mission to promote the development of policy of the Internet as a global technical infrastructure, a resource to enrich people's lives, and a force for good in society.

One of ISOCs key drivers is that everyone has the right to be digital included, have meaningful connectivity, and are empowered by being connected. As it stands today Namibia falls short on meeting this objective with a sizable number of its population forcibly excluded from the benefits of the internet for reasons such as lack of access, accessibility, and affordability.

When we look at Windhoek, we see existing operators compete to bring LTE, 4G and fibre to home services to the suburbs, to those that already have, given the already connected faster and more reliable internet connectivity. What we do not see in is the same appetite to deliver such services to the less affluent areas.

It is our view that the award of this licensee will speed up the digitalisation process of all areas within the municipality boundary, and it is our hope that the municipality of Windhoek will leverage this license to the benefit of all of its residents.

ISOC Namibia recommendation to CRAN is that the award of the license to the municipality of Windhoek stand baring any legal reason that ISOC has not been made aware of that would prohibit the municipality holding such license. If the municipality is denied this license, it is the opinion of ISOC that this might impede Namibia's progress to digitalization and undermine the Namibian Broadband Policy of 2020.

Sincerely,



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