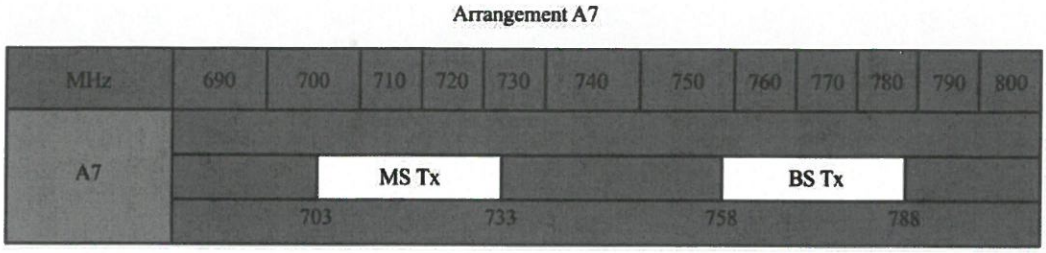
Figure 1



4. The allocation for PPDR services in accordance with Resolution 646 (WRC-19) and the SADC Framework for Harmonisation of Radio Frequency Spectrum for Public Protection and Disaster Relief (PPDR)-

a. 698 – 703 MHz for Uplink and 753 – 758 MHz for downlink (2x5 MHz); and

b. 733 -736 MHz uplink and 788 – 791 MHz downlink (2x3 MHz) is shown in Figure 2 below:

Figure 2

698-703	703-708	708-713	713-718	718-723	723-728	728-733	733-736	736-753	753-758	758-763	763-768	768-773	773-778	778-783	783-788	788-791
PPDR a) up-link	b) IMT uplink (MFCN)						PPDR c) up-link		PPDR a) down-link	b) IMT downlink (MFCN)						PPDR c) down-link
5 MHz	30 MHz (6 blocks of 5 MHz)						3 MHz		5 MHz	30 MHz (6 blocks of 5 MHz)						3 MHz

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COMMUNICATIONS REGULATORY AUTHORITY OF NAMIBIA

No. 445 2021

AMENDMENT TO REGULATIONS PRESCRIBING THE NATIONAL NUMBERING PLAN FOR USE IN THE PROVISION OF TELECOMMUNICATIONS SERVICES IN THE REPUBLIC OF NAMIBIA, NUMBERING LICENCE FEES AND PROCEDURES FOR NUMBER LICENCES: COMMUNICATIONS ACT, 2009

The Communications Regulatory Authority of Namibia, in terms of Sections 81(5) and 129 of the Communications Act, 2009 (Act No. 8 of 2009), amends the Regulations Prescribing the National Numbering Plan for Use in the Provision of Telecommunications Services in the Republic of Namibia, Numbering Licence Fees and Procedures for Number Licences as published in the Government Gazette No. 5983, General Notice No. 18 dated 01 April 2021 as set out in the Schedule.

H. M. GAOMAB II
CHAIRPERSON
COMMUNICATIONS REGULATORY AUTHORITY OF NAMIBIA

SCHEDULE

AMENDMENT OF THE REGULATIONS PRESCRIBING THE NATIONAL NUMBERING PLAN FOR USE IN THE PROVISION OF TELECOMMUNICATIONS SERVICES IN THE REPUBLIC OF NAMIBIA, NUMBERING LICENCE FEES AND PROCEDURES FOR NUMBER LICENCES: COMMUNICATIONS ACT, 2009

Amendment of regulation 39

1. Regulation 39 of the Regulations is amended by the substitution for subregulation (1)(b) of the following subregulation

(a) The Authority shall calculate the chargeable fee per number based on the 'chargeable quantity of numbers by applying the reference value to a weight,[1] to reflect the value of shorter numbers.

Number	Weight
3 Digit Numbers	=1 000,000
4 Digit Numbers	=100,000
5 Digit Numbers	=10, 000
6 Digit Numbers	=1, 000
7 Digit Numbers	=100
8 Digit Numbers	=10
9 Digit Numbers	= 1

2. Regulation 39 of the Regulations is amended by the substitution for subregulation (1)(e) of the following subregulation

(e) The reference value is determined by the Authority as set out in Annexure **D** and may be reviewed on annual basis.

3. Regulation 39 of the Regulations is amended by the repeal of subregulation (1)(f).

ANNEXURE D

Regulation 39(e)

CHARGEABLE FEE

In terms of regulation 39(e) the Authority hereby determine the reference value.

*The reference value is set at Zero Namibian Dollars and Four Eight Zero Three Cents (**N$ 0.4803**).*

Number	Weight	N$ (fees payable)
3 Digit Numbers	=1 000,000	=480,300
4 Digit Numbers	=100,000	=48,030
5 Digit Numbers	=10, 000	=4,803
6 Digit Numbers	=1, 000	=480.30
7 Digit Numbers	=100	=48.03
8 Digit Numbers	=10	=4.803
9 Digit Numbers	= 1	= 0.4803

Annual Number Fee = number x weight x reference value

[1] Weighting refers to the total numbers not available for use if a certain number with lesser digits is allocated for use to a licensee.

ANNEXURE E

DISCUSSION PAPER ON NUMBERING FEES FOR CRAN

1. Introduction

In 2016 CRAN set out *Regulations prescribing the National Numbering Plan for use in the Provision of Telecommunications Services in the Republic of Namibia, Numbering Licence Fees and Procedures for Number Licences*. The fees prescribed in these regulations were charged for the first time in 2018 and then in subsequent years. Telecom Namibia and MTC challenged the fees based on section 81(5) which states that "*the Authority must allocate numbers in return for a fee that is no greater than necessary to compensate for the management costs of the numbering plan and control of its use.*"

The objectives of the Act guide all of CRAN's actions: The fees CRAN collects are subject to the objectives of the Act, which fit in with the general trend towards liberalisation, privatisation and increased competition in order to meet the objectives of affordability and increased penetration.

2. Economics of Numbering

The rise of new services and the advent of competition have given to telecommunication numbers a significant economic dimension. Any economic considerations around numbers arise for two main reasons:

- First, a fairly administered numbering plan can facilitate competition in service provision and thus bring benefits to users by reducing tariffs and by increasing the quality standards in services provided. In order for competition to flourish, however, operators and service providers should be treated on an equal basis regarding access to number resources.

- Second, numbers become important tools in the hands of value-added service providers. Given that most of these services are highly profitable for operators, the allocation of specific number ranges to provide exclusive access to services such as mobile telephony, personal communication and premium rate services increases the value of numbers. Moreover, it is recognised that a limited range of numbers contain "higher" value than others because their memorable structure brings benefits to the called party. (OCDE/GD(95)117).

As competition increases and new numbering requirements emerge it becomes universally recognised that "*telephone numbers are a national resource and should be for the customer -- not for the operators to brand*" (OFTEL, 1993a). New operators and service providers need to have access to numbers and have the right to utilise them in a way that best suits their needs and can facilitate service provision.

Not all number ranges have the same value to users. Different users may attribute more value to a number than others based on how easy it is to remember and what it might be utilised for. Numbers are therefore a scarce resource that should be managed and paid for taking the economic value of the number into consideration.

3. Current Numbering Fees

Regulation 39(f) of the Regulations Prescribing the National Numbering Plan for Use in the provision of Telecommunications Services in the Republic of Namibia, Numbering Licence Fees and Procedures for Number Licences set the reference value for numbers at N$ 1.00. The Regulation further makes provision that it should be reviewed every three (3) years.

In line with the above requirement CRAN has therefore decided that a recalculation of numbering fees have to be done as well as some amendments to the current regulations.

The current numbering fees are as follows:

3 Digit Numbers	= 1,000,000
4 Digit Numbers	= 100,000
5 Digit Numbers	=10,000
6 Digit Numbers	=1,000
7 Digit Numbers	=100
8 Digit Numbers	=10
9 Digit Numbers	= 1

4. CRAN Financials for Numbering

The total cost of managing the numbering plan includes cost for the numbering audit, legal fees, calculation of fees, management of number portability, etc.

The costs from 2018/2019 to 2022/2023 are as follows:

Table 1: Financials and Calculations for Numbering					
	2018/2019	**2019/2020**	**2020/2021**	**2021/2022**	**2022/2023**
Financials	6,696,309	7,654,700	2,000,000	2,090,000	2,184,050
Numbers	41,208,451	48,988,851	4,164,462	4,164,462	4,164,462
Cost/number	***0.16***	***0.155***	***0.4803***	***0.502***	***0.5244***
Source:	*AFS for CRAN 2018/19 – 2019/20*		*Budget 2020/2021*	*Projected Budget*	

There are a number of reasons on why the cost per number increased:

a. Due to more efficient number use 3-digit numbers were withdrawn by licensees and licensees started utilising 5-digit numbers; and

b. Unutilised numbers were withdrawn;

The CRAN budget to manage the number licenses have also decreased due to fewer number licences, but the total cost per number still increased.

5. Numbering Fees in other Jurisdictions

Most countries that charge fees for numbering resources have a number of fees that are charged for such as registration-, usage- and annual fees. A number of SADC countries do not charge numbering fees at all even though they have numbering plans due to their legislation not providing for the charging for numbers.

Table 2: Zambia ZICTA's Fee structure for Numbering	**Fee Units**	
Item	**ZMW**	**N$**
Registration fees		
All other categories	40,000	26,942
Carrier pre-selection	200,000	134,712
Annual Fees (C)	1	0.674
Annual Fee (F_A)		
Annual Return	233	157

Table 2: Zambia ZICTA's Fee structure for Numbering	Fee Units	
Item	ZMW	N$
Other Codes		
Mobile Network Code	20,000	13,471
National Destination Code	20,000	13,471
International Signaling Point Codes	20,000	13,471
National Signaling Point Codes	20,000	13,471
Network Colour Codes	20,000	13,471
SIM Headers	10,000	6,736
Service Numbers (Freephones, Premiums)	10,000	6,736
Carrier Selection Codes	100,000	67,356
Short Codes		
3 digits	100,000	67,356
4 digits	60,000	40,414
Source:	https://www.zicta.zm/storage/posts/attachments/0r9W6SdgD02vUW4N7D8k5NlA9dDCeVDex-QDHFzx8.pdf	

- *Registration fees are once-off fees to be paid at lodging the application*
- *The subscriber number (C) fee set out in the table shall be the application fee for the purpose of determination of the annual numbering fee formulae, where C=1 unit*
- *For resource user's individually assigned number blocks, the payable annual fees shall be calculated as per equation below; $F_A=B \times C$, where a. F_A is the annual numbering fee to be paid by resource user, B is the total number block assigned, allocated to the resource user C, C is the fee for each subscriber number in the assigned number block allocated to the resource user*

Uganda charges no fees for the other numbering resources except for short codes. Their numbering plan is currently under review.

Tanzania also uses a number of fees.

Table 3: Tanzania TCRA's Fee structure for Numbering						
Type of Numbering Resource	Application		Registration		Annual Maintenance Fee	
	USD	N$	USD	N$	USD	N$
Prefix for Networks (NDC & MNDC)	10	145	2,000	29,055	2,000	29,055
Subscriber Numbers	N/A		N/A		0.20/subscriber number	2.89
National Signaling Point	10	145	2,000	29,055	2,000	29,055
International Signaling Point	10	145	2,000	29,055	2,000	29,055
Mobile Network Identification Code	10	145	2,000	29,055	2,000	29,055
SIM Header	10	145	2,000	29,055	2,000	29,055
Data Network Identification Codes	10	145	2,000	29,055	2,000	29,055

Table 3: Tanzania TCRA's Fee structure for Numbering						
Type of Numbering Resource	**Application**		**Registration**		**Annual Maintenance Fee**	
	USD	**N$**	**USD**	**N$**	**USD**	**N$**
Corporate Services Network Access Numbers	10	145	2,000	29,055	2,000	29,055
Carrier Selection/Preselection Codes	10	145	10,000	145,277	5,000	72,639
Premium Rate Access Codes	10	145	10,000	145,277	5,000	72,639
Special and Fixed Access Codes (block)	10	145	1,000	14,528	2,000	29,055
Special and Fixed Access Codes Premium Rate Access codes (Single number)	10	145	2,000	29,055	2,500	36,319
VAS SMS & Special Services Short Codes:						
Gold	10	145	4,000	58,111	2,500	36,319
Source:	https://www.tcra.go.tz/document/Application%20Guidelines%20and%20Fees%20for%20Numbering%20Resources%20-%20April%202018					

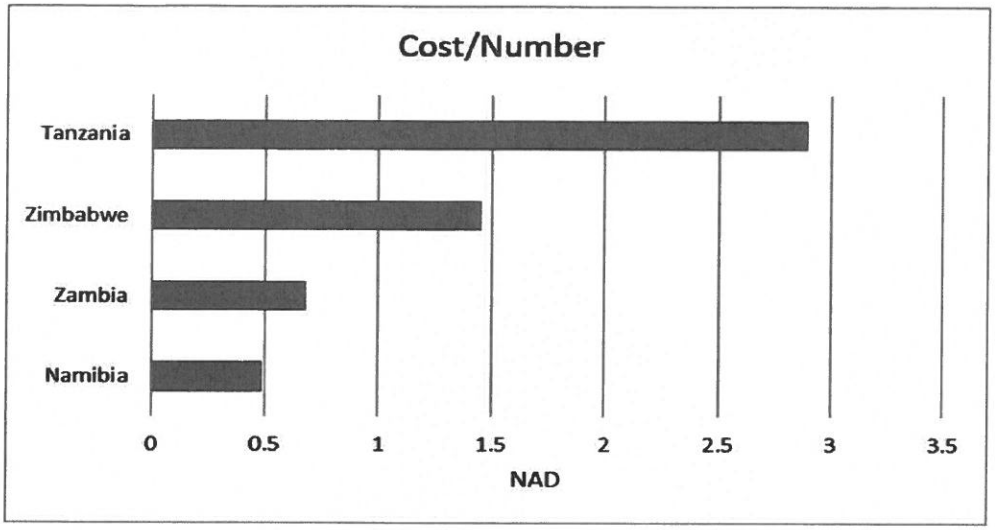
Zimbabwe has the following fee structure for numbering.

Table 4: Zimbabwe - POTRAZ's license fee structure		
	USD	**N$**
Subscriber numbers	0.10/unit	1.45
Network Destination Codes	50	723
Premium Rate service Short Code	1,200	17,356
No Premium Rate service Short Code	50	723
International Signaling Point Codes	50	723
National Signaling Point Codes	50	723
Mobile Network Identifiers – MNC + NCC	50	723
System Access (USSD) Short Codes	50 (excl 15% VAT)	723 (excl 15% VAT)
Premium Rates Short Code	1,200 (excl 15% VAT)	17,356 (excl 15% VAT)
Source	http://www.potraz.gov.zw/?p=80	

ICASA is not charging any numbering fees.

Namibia's proposed numbering fees are on par with those countries in the SADC region that charge for numbering and is lower than most countries used in the comparison.

Figure 1: Numbering Fees in SADC (N$/number)



6. Conclusion and Recommendations

The following is therefore recommended:

a. A reference value of NAD 0.4803 per number based on the costing and approved budget of CRAN resulting in the table below:

Number	Weight	Fee in NAD
3 Digit Numbers	1,000,000	= 480,300
4 Digit Numbers	100,000	= 48,030
5 Digit Numbers	10,000	= 4,803
6 Digit Numbers	1,000	= 480.30
7 Digit Numbers	100	= 48.03
8 Digit Numbers	10	= 4.803
9 Digit Numbers	1	= 0.4803

Annual Number Fee = number x weight x reference value

b. That a new fee for numbering be determined, annually, based on the cost in the approved budget and the number audit to ensure no over– or under recovery as set out in section 81(5) of the Communications Act.

7. References

OECD (1995-01-01), "The Economic and Regulatory Aspects of Telecommunication Numbering", OECD Digital Economy Papers, No. 12, OECD Publishing, Paris. http://dx.doi.org/10.1787/237502514428

http://www.potraz.gov.zw/?p=80

https://www.tcra.go.tz/document/Application%20Guidelines%20and%20Fees%20for%20Numbering%20Resources%20-%20April%202018

https://www.zicta.zm/storage/posts/attachments/0r9W6SdgD02vUW4N7D8k5NlA9dDCeVDexQDHFzx8.pdf