



19 January 2026

Polume Lume

Acting Chief Executive Officer

National Information and Communications Technology Authority

P.O. Box 8444

Boroko 111

National Capital District

Papua New Guinea

Dear Mr. Lume,

RE: PNG DATA CO LIMITED – SUBMISSION TO PUBLIC CONSULTATION ON SERVICE - SPECIFIC PRICING PRINCIPLES FOR DECLARED WHOLESALE SERVICES

PNG DataCo Limited ("PNG DataCo") welcomes the opportunity to provide this submission in response to the Public Consultation into the Service-Specific Pricing Principles for Certain Declared Wholesale Services – Methodology and Pricing Principles, published by the NICTA on 23 December 2025.

As the designated wholesale only access provider for national and international transmission infrastructure in Papua New Guinea, PNG DataCo has a strong interest in ensuring that the service-specific pricing principles adopted by NICTA are robust, transparent, and consistent with both the General Pricing Principles under the NICTA Act 2009 and international regulatory cost-modelling best practice.

PNG DataCo supports NICTA's objective of establishing a clear, economically sound, and forward-looking methodology for determining cost-based prices for the declared wholesale services. PNG DataCo acknowledges NICTA's focus on:

- Promoting economically efficient investment and use of infrastructure
- Ensuring full recovery of efficiently incurred real costs including service installation costs
- Including a reasonable return on investment commensurate with regulatory and commercial risk and
- Enhancing transparency and predictability in wholesale pricing outcomes

PNG DataCo's accompanying submission provides detailed responses to the consultation questions raised by NICTA, drawing on PNG DataCo's operational experience as a wholesale infrastructure provider and on established international cost-modelling and regulatory pricing frameworks. The submission responses are intended to assist NICTA in finalising service-specific pricing principles that are practical to implement, aligned with the real costs, unique geographic and demand characteristics of Papua New Guinea, and supportive of long-term infrastructure sustainability and sector development.

PNG DataCo remains committed to engaging constructively with NICTA throughout this consultation process and in subsequent phases, including the development, calibration, and review of cost models. PNG DataCo would welcome the opportunity to provide further clarification or participate in any technical workshops or discussions that NICTA may convene as part of this process.

yes, you'll be covered



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Should you require any additional information in relation to this submission, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Paul Komboi', with a flourish above the 'i'.

PAUL KOMBOI, OBE, GCL
Chief Executive Officer