

RECEIVED
1545 PM
22 FEB 2018

BY: *EUA's office*
Charles Punaha
Chief Executive Officer
NICTA
Level 4&5, Tower 1,
Stratos Building,
Savanah Heights

Dear Charles,

Subject: Submission of Comments on Universal Access Levy 2018, Universal Access Strategic Plan (2018-2022) and Project and Operational Plan 2018.

As per my discussion on the above subject at your office with the consultant and staff, this is to confirm that bmobile-vodafone would like to see the following changes to the strategy on the deployment of the mobile infrastructure using the Universal Access Levy.

Our requirement is that the mobile infrastructure deployed / implemented by the Levy must be capable of being shared by all mobile operators. The previous deployment under the World Bank funding does not allow bmobile-vodafone (as the unsuccessful bidder) to share the infrastructure thereby disadvantaging the communities served by the infrastructure. These communities do not have a viable competitive operator to rely on to provide a cheaper and cost effective mobile service.

Like before, the proposed strategy does not provide any option for the unsuccessful bidder to share the mobile infrastructure. Knowing very well that there are multiple mobile operators, NICTA as the regulator must look to promote competition in the PNG market place for the benefit of all the Papua New Guineans.

To this end we proposed the following inclusion into the strategy. The mobile infrastructure deployed under the Levy by the successful bidder must at a minimum:

1. Function as a Multi-Operator Radio Access Network (MORAN) thereby allowing other unsuccessful bidders (mobile operator(s)) to share the network and,
2. Allow the unsuccessful bidder (mobile operator(s)) to roam on to the infrastructure.

This will promote competition in the market place as well as providing a fair return to the mobile operators paying a Levy to NICTA for the Universal Access Services.

Bmobile-vodafone will find it extremely difficult to obtain approval from the Board and the shareholders to pay the Levy unless we see a return on the investment noting that bmobile-vodafone already pay other fees and taxes in operating a mobile service in PNG.

Thanks & Regards,

Athula Biyanwila
Athula Biyanwila
Interim CEO

RECEIVED
16 FEB 2018

BY: *OCED*



DECIA / R / DUAS

For your attention / action

*→ Noted receipt of Submission.
→ Soft copy to DECIA + MRCP
for further action.
→ Original to FILE.*

Athula
Ag DECIA
23/02/18