



**Garamut Connect Ltd**

## **Submission on the Declaration of Wholesale Services under the NICTA Act**

### **Background**

On 15<sup>th</sup> May 2025, Garamut Connect Ltd (GCL) received an invitation from the National Information and Communications Technology Authority (**NICTA**) to review and respond to the Discussion Paper titled "**Public Inquiry Into the Potential Declaration of Certain Wholesale Services.**"

This inquiry is being conducted under Section 230 of the NICTA Act, which authorizes NICTA to investigate whether certain wholesale telecommunications services should be formally declared for regulation by the Minister under Sections 127 to 131 of the Act.

The wholesale services under review include:

### **1. Main Category (Previously Declared in 2018):**

- Wholesale Domestic Transmission Capacity Services (DCTS)
- International submarine cable transmission capacity service
- International submarine cable gateway access service
- International submarine cable duct access service
- Wholesale broadband capacity service

These declarations expired in March 2024, potentially undermining competition and efficiency objectives under Part VI of the NICTA Act.

### **2. Additional Categories Proposed for Declaration:**

- International dedicated submarine cable capacity service

- International submarine cable facilities access service (3rd party access)
- Long-haul dedicated capacity service
- Local dedicated capacity service
- Internet Access Service
- Wholesale Mobile Tower Access Service
- Wholesale IP Transit Service
- Wholesale Mobile Roaming Service

These services are foundational inputs for the delivery of retail ICT services and affect the ability of new market entrants like GCL to compete and expand coverage across Papua New Guinea (PNG).

NICTA's preliminary findings suggest that:

- ✓ Some wholesale markets in PNG are not effectively competitive.
- ✓ Dominant providers may restrict access, inflate prices, and limit infrastructure sharing.

In light of these findings, NICTA has called for public submissions to determine whether formal declarations should be made and what terms and pricing structures should be considered. This document serves as Garamut Connect Ltd's formal submission.

## **Section 1: GCL's Formal Responses to Discussion Paper Questions**

### **Questions 1 to 15**

GCL has reviewed and supports each proposed market definition and declaration as outlined by NICTA. In summary:

- We **agree with the market definitions**, which are technically sound and commercially relevant.
- We support the declarations under Sections 128(a), (b), and (c) of the NICTA Act, which promote competition, enable efficient infrastructure use, and encourage sustainable investment.

- These measures are vital for:
  - ✓ Lowering barriers to entry for new providers.
  - ✓ Improving service affordability and quality for consumers.
  - ✓ Driving nationwide digital inclusion and economic growth.

## **Strategic Alignment**

GCL strongly supports NICTA's objectives to open up critical wholesale services. Our business strategy focuses on enabling inclusive and affordable telecommunications, supported by:

- Renewable energy-powered infrastructure to reduce costs and environmental impact.
- AI-driven network optimization to improve operational efficiency and service quality.
- Flexible service packages designed to meet the needs of both urban and rural communities.
- A hybrid operational model leveraging strengths of both MNO and MVNO approaches to adapt to fast-changing technology trends.

While GCL has not yet rolled out its full suite of services, we are actively developing foundational infrastructure such as a Green Data Centre and Satellite Gateway services. These are key enablers that will allow us to provide reliable, scalable, and affordable connectivity solutions in the near future.

## **Global Case Studies Supporting Declaration**

Countries with similar challenges have adopted similar regulatory approaches to great success:

- India – TRAI (2006 & 2008): Infrastructure sharing and regulated interconnect charges led to mobile penetration exceeding 90%.

- South Africa – ICASA (2005 & 2021): Open access tower and spectrum regulations stimulated rural network expansion and improved affordability.
- Indonesia – Kominfo (2008 & 2018): Mandated open access to backhaul and towers enabled rapid growth in outer islands and underserved areas.
- Kenya – CAK (1998 & 2024): Tower and fibre leasing plus roaming regulations improved national coverage and service reliability.

These examples illustrate the value of proactive wholesale regulation in bridging digital divides and fostering innovation.

## **Managing Incumbent Resistance**

We recognize that some resistance may arise from incumbent operators. However, the NICTA Act empowers the regulator to act in the public interest and ensure fair access to essential infrastructure. Incumbents should see this as an opportunity to modernize operations, adopt cost-efficient models, and collaborate to expand overall market reach rather than resisting reform.

## **Final Position**

Garamut Connect Ltd strongly supports NICTA's proposal to declare all the listed wholesale services. This will create a foundation for sustainable competition, support new entrants, and deliver affordable, high-quality connectivity to all Papua New Guineans.

We encourage the Minister and all stakeholders to remain aligned with the pro-competitive and pro-consumer spirit of the NICTA Act and take decisive action to open up the market for all.

## **End of Submission**

We thank NICTA for this important inquiry and for the opportunity to contribute to a more inclusive, competitive, and efficient telecommunications sector in Papua New Guinea.

Submitted by:

**Garamut Connect Ltd**

13<sup>th</sup> June 2025

## **References & International Case Examples**

1. India – TRAI: TRAI Annual Reports (2020–2023); India Telecom Statistics.
2. South Africa – ICASA: Draft Findings Document on Wholesale Open Access Networks (WOAN), 2020.
3. Indonesia – Koinfo: Palapa Ring Project Reports, Ministry of Communication and Informatics, 2022.
4. Kenya – CAK: ICT Sector Statistical Report Q1 2023; National Broadband Strategy 2023–2027.
5. Papua New Guinea – NICTA Act: Sections 127–131; Part VI – Access to Declared Services.

This version is comprehensive, strategic, and detailed without disclosing operationally sensitive specifics.