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**DATE: 10/06/2025 – 9:30AM**

**THE CEO**

**SUBJECT: NOTICE OF PUBLIC INQUIRY INTO THE POTENTIAL DECLARATION OF CERTAIN WHOLESALE SERVICES.**

### **1. Introduction**

MYNET welcomes the opportunity to contribute to the Public Inquiry and Consultations initiated by the National Information and Communications Technology Authority (NICTA). As a licensed Internet Service Provider operating for nearly a decade in Papua New Guinea, we serve a growing base of residential, SME, and enterprise clients across urban and regional areas. Our mission aligns closely with NICTA's regulatory vision — to ensure equitable, competitive, and sustainable access to digital infrastructure and services.

We commend NICTA for extending the deadline for written submissions and take this opportunity to provide our input on the following matters:

- The Public Inquiry into the Potential Declaration of Certain Wholesale Services
- The Consumer Protection Rule Amendment 2024
- The Public Consultation to the Complaints Management System

### **2. Response to the Public Inquiry: Potential Declaration of Certain Wholesale Services**

MYNET supports NICTA's efforts to review the structure and accessibility of key wholesale services, particularly in areas where vertical integration and market dominance can impede fair competition. We agree that where essential infrastructure — such as tower access, national backhaul, or undersea capacity — creates bottlenecks or restricts downstream competition, regulation may be necessary to open access and encourage innovation.

#### **Operational Concerns from Genuine ISPs**

As a fully operational ISP, MYNET has invested substantially in infrastructure including towers, fiber backbone, core networking equipment, AAA systems, billing platforms, and support teams. However, we are deeply concerned by a growing trend in which certain entities register as ISPs solely to access wholesale pricing from upstream providers like Dataco — without actually deploying infrastructure or delivering services to the public.

**This leads to:**

- **Unfair Market Distortion:** These entities bypass legitimate ISPs, reselling or using wholesale services internally, while avoiding the costs of real operations.
- **Undermined Investment:** Operational ISPs like MYNET cannot sustain infrastructure expansion if we are undercut by paper-ISPs with no service obligations.
- **Regulatory Loopholes:** The lack of rigorous compliance checks enables this ongoing abuse of licensing privileges.

**Recommendations:**

- **Tighten ISP licensing requirements** to ensure applicants are genuinely operational.
- **Introduce regular compliance audits** to verify infrastructure and service delivery.
- **Restrict access to regulated wholesale services** to only those ISPs actively providing public-facing services.

These steps are vital to ensure fair competition and to protect the long-term sustainability of the ISP sector in PNG.

**3. Response to the Consumer Protection Rule Amendment 2024**

MYNET supports the intent behind the 2024 amendments, which aim to strengthen consumer protections and enhance transparency. As an ISP committed to service quality and fairness, we believe clear consumer safeguards build trust and strengthen digital engagement.

**Support:**

- Clear service terms, complaint resolution processes, and minimum performance standards are important in building consumer confidence.

**Concerns:**

- Implementation timelines and technical obligations must consider the scale and capacity of providers. For many ISPs, these changes will involve significant investment and operational adjustment — at a time when margins are already under pressure due to falling retail prices and rising costs.

**Centralized Compliance Platform – A Practical Solution**

MYNET urges NICTA to consider creating a **centralized compliance platform**, hosted and maintained by NICTA itself. Such a system would standardize reporting, complaint handling, and other regulatory submissions, significantly reducing the burden on individual ISPs.



### **Why This Matters:**

- ISPs, especially smaller providers, are under significant financial pressure. Building and managing independent compliance systems adds to overhead that many simply cannot afford.
- A centralized system would ensure consistent data, improve regulatory oversight, and allow ISPs to focus resources on improving network coverage and service reliability.

### **Key Features Could Include:**

- A web portal for lodging and tracking consumer complaints.
- Templates for submitting performance and compliance reports.
- KPI dashboards that replace the need for expensive internal tools.

Such a platform would encourage compliance without overburdening the sector, ultimately benefiting both regulators and consumers.

## **4. Response to the Public Consultation: Complaints Management System**

MYNET supports the development of a robust and standardized complaints handling framework.

### **Support:**

- A clear and structured approach to complaint management helps improve accountability and service delivery.

### **Concerns:**

- Forcing ISPs to implement uniform systems may not be feasible. Many already use custom helpdesk tools suited to their scale and customer base.

### **Recommendations:**

- Allow flexibility by offering a **compliance interface** (e.g., an API or reporting template) that integrates with existing ISP tools.
- NICTA should promote **consumer education** around complaint escalation, so users are informed of their rights and available pathways.

## **5. Conclusion**

MYNET is committed to Papua New Guinea's digital advancement. We believe regulation must strike a balance between protecting consumers and supporting the viability of service providers who are the backbone of connectivity. We thank NICTA for the opportunity to share our views and reaffirm our willingness to participate in any further consultations or working groups.

Thank you for your time.

Yours Sincerely

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The Manager



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