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Mr. Charles Punaha

Chief Executive Officer
National information And Communication Technology Authority
P O Box 8227, BOROKO, N.C.D.

Friday 02/02/2018

Dear Mr. Punaha,

Subject: Universal Access Service Levy for 2018

Introduction

Firstly, I would like to thank you for the opportunity to make contributions to the UAS Levy for 2108 consultative paper.

With communication and access to information becoming increasingly important to national development and service provision, it is critical that efforts are made to connect underserved regions and areas that are less economically attractive for infrastructure investment. The establishment of a Universal Access Service Fund is one way of making capital more available to connect such areas. I commend NICTA for taking the initiative and fostering an inclusive process to this stage.

The following comments are based on the corresponding consultative paper issued on December 08, 2017, the UAS workshop on January 15, 2018, the authors own expertise and information available on similar initiatives that have been undertaken. The views expressed - though many may be consistent with that of organisations I affiliate with - are my own.

Comments

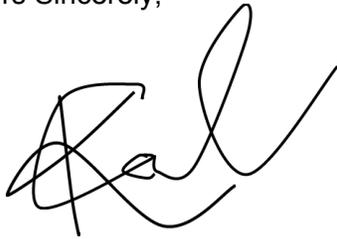
- 1. Terminology** - Perhaps the document would greatly benefit from a glossary of some sort for terms used. For example, the term broadband is used a little loosely in the document. It would be useful to know what constitutes a broadband connection in this context for well defined outcomes.

2. **Market Gap** - Looking beyond 2018, accurate data is critical for continued success of the project. The high-level estimated nature of the market gap analyses as well as the proprietary techniques employed are noted. Throughout 2018, careful consideration made to the monitoring and evaluation of the market gap and the project impacts would in theory contribute to more accurate information. Potentially enhancing investor confidence and participation from various stakeholders.
3. **Targets** - It is encouraging to know that the focus is not only on telephony and basic data connection but on 100% 3G+ minimum. We are however quickly discovering that 3G is becoming dated for many modern applications of the Internet. I propose that where there is the possibility to establish anything greater, the option should be take.
4. **Community and Institutional Networks** - Although existing infrastructure such as copper networks exist in areas where there is an institutional presence, these places should not be ignored. It is encouraging that this is already being taken into account and that existing infrastructure could be better utilised for service delivery. This can be expanded to other areas where there is existing infrastructure and not just state institutions. If this translates to more affordable connections then it would certainly benefit communities.
5. **ICT Platform for Future Growth** - There has to be a reason for people to connect to the ICT. And the connection must be focused toward improving livelihoods of Papua New Guineans. NICTA's vision state includes the line *"Growing contribution of advanced and innovative ICTs to support inclusive socio-economic development and opportunity"*. This emphasises on connection with a purpose for positive outcomes and not just connection for the sake of connection. Initiatives promoting local content and digital literacy are among what is needed and I commend NICTA for taking these into account. I would however encourage a greater portion of the budget than the current PGK 10.0M.
6. **Funding** -
 - a. With the proposed ceiling amount of a 2% levy fee, I would encourage establishing agreeable fees that can be done so with a level of efficiency to enable other aspects of the project.
 - b. A certain level of autonomy must be maintained for decision making regarding the fund.
 - c. Other sources of funding such as community grants must also be considered and members of the community and other stakeholders must be encouraged to take advantage. This can be done so by liaising with providers and helping to facilitate with applications.
 - d. There must be an explicit responsibility for fund recipients to make infrastructure as accessible to other parties as much as possible. For example, a tower set up with UAS funding must always allow various licensed carriers or community networks to utilise infrastructure by attaching their own receivers for example.

Conclusion

I once again commend NICTA for undertaking this initiative and for maintaining such an open process. I will also encourage NICTA and the UAS to further consider how to expand participation and to bring in more stakeholders. I do hope the comments made will go toward enhancing the initiative and have positive outcomes. Do not hesitate to contact me should you require further information or input.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Kasek', with a stylized flourish extending to the right.

Mr. Kasek Ishmael Galgal

Co-Chair, Pacific Island Chapter of the Internet Society