

28 August 2026

The Chief Executive Officer

National Information and Communications Technology Authority (NICTA)

P.O. Box 8444, Boroko, National Capital District

Papua New Guinea

## Re: Submission on UAS Consultation Paper No.01/2027 — Proposed 2027 UAS Programme

Telikom Limited (Telikom) welcomes the opportunity to respond to NICTA's Universal Access and Service (UAS) Project Consultation Paper No.01/2027, issued 6 August 2026. As a licensed ICT operator and a levy contributor to the UAS Fund, Telikom sets out below its comments on the proposed programme, structured against the consultation questions and matters raised in the paper, together with additional points for NICTA's consideration.

### 1. Overall Position

Telikom supports NICTA's continued prioritisation of mobile broadband infrastructure to close the identified 3G/4G coverage gaps (approximately 23% and 30% of the population respectively remain outside coverage). We welcome the evidence-based, criteria-driven site selection approach set out in Section 6, and the emphasis on open-access infrastructure sharing in Section 5.2.

### 2. Infrastructure Sharing — Commercial Terms

We support open-access in principle but request that commercial access terms (co-location fees, power sharing, operations and maintenance cost recovery) be set at fair, cost-reflective rates determined through negotiation or a NICTA-published benchmark — not mandated below-cost access — to protect the commercial viability of operators funding tower construction and maintenance. Given the high cost of building and maintaining shared infrastructure in remote and geographically challenging areas, we recommend Government subsidise a portion of these costs, so that open-access obligations do not become commercially unsustainable for operators expected to host and maintain the shared infrastructure.

### 3. Alignment with Existing Network Investment

Telikom is currently undertaking significant network investment of its own. We recommend NICTA cross-reference the proposed 322 UAS sites at Annex A against Telikom's existing and planned infrastructure to maximise synergies and avoid duplicated investment. Telikom would be interested in exploring options to

co-locate at these sites where feasible, to avoid duplication of infrastructure and reduce overall programme and industry costs.

## 4. Procurement Approach

We favour a mixed procurement model: competitive tendering for greenfield clusters, combined with framework agreements or negotiated arrangements for sites adjacent to existing licensed-operator infrastructure, where incumbents can deliver faster and at lower incremental cost than a new entrant.

## 5. UAS Levy

Given operators are simultaneously funding significant private network capital expenditure, we recommend that the 2027 UAS Programme be fully funded by Government, rather than through a levy imposed on licensed operators. This would avoid compounding capital pressure on operators already investing heavily in their own network infrastructure, while still allowing the Programme's socio-economic objectives to be met.

## 6. Cybersecurity and User Protection

The programme should mandate baseline cyber-hygiene requirements for all UAS-funded infrastructure and connected services — for example secure device provisioning, DNS/website filtering and malware-blocking at the network level, spam and scam SMS filtering, and consumer awareness materials distributed alongside new coverage rollouts — so that newly connected, often first-time, users are not disproportionately exposed to cyber threats and online fraud.

## 7. Subsidised Access for Vulnerable Groups

We recommend NICTA consider a subsidised or zero-rated access tier for vulnerable community segments — school-age children (for digital education platforms) and elderly users (for health and government services) — funded through the UAS Fund, to ensure the programme's socio-economic benefits are not limited by device or data affordability even after coverage is delivered.

## 8. Protecting Local Operators and Critical Infrastructure from LEO Geopolitical Risk

NICTA should assess the strategic risk of government and critical-service infrastructure (health, education, emergency services, financial systems) becoming dependent on direct foreign-owned Low Earth Orbit (LEO) satellite services. We recommend the UAS Programme favour terrestrial mobile broadband and locally operated infrastructure as the primary connectivity layer, with LEO used as a backhaul supplement under local operator control rather than as the direct access layer for critical services, to preserve sovereign resilience and continuity of service.

## 9. Regulated Infrastructure Sharing to Compete with LEO

Related to Point 8: for UAS-funded infrastructure sharing to be commercially viable against low-cost LEO consumer offerings, sharing terms need active regulatory oversight — pricing benchmarks, dispute resolution, and minimum service level agreements — rather than a purely market-negotiated model. Otherwise, local operators' risk being undercut by LEO providers while still carrying the capital burden of terrestrial build-out.

## 10. Wi-Fi Offload as a Core Deployment Technology

We recommend NICTA formally include Wi-Fi offload (public hotspot access points on lighter backhaul) as a qualifying technology option under the technology-neutral framework described at Section 7.1, particularly for very remote, low-density sites. This can materially reduce both capital expenditure and deployment time compared to full macro or tower builds, extending programme reach within the same budget envelope.

## 11. Population-Density-Based Technology Selection

We recommend that Annex A site selection criteria explicitly incorporate population density bands to determine the appropriate technology (Macro, Rural Star, or Wi-Fi Offload) per site, rather than technology being determined on an ad hoc basis. This would reduce long-term operational costs by avoiding over-specification, for example full macro towers in very low-density areas that would be better served by Wi-Fi offload or Rural Star solutions.

## 12. Potential Overlap with Telikom Greenfield Sites

Telikom expects to finalise, later this year, a list of greenfield sites under its own network modernisation programme. Some of these may overlap geographically with sites proposed in Annex A. We request that NICTA allow a supplementary submission window, or a formal reconciliation step prior to final programme approval, once Telikom's greenfield list is confirmed, to avoid duplicated public and private investment.

## 13. Indicative Budget Guidance — Wi-Fi Offload vs Greenfield 3G/4G Sites

For NICTA's costing model, indicative per-site cost ranges (to be validated against final technical specifications and site conditions) are set out below:

| Site Type                                     | Indicative Cost (PGK)  | Notes                                                                                                 |
|-----------------------------------------------|------------------------|-------------------------------------------------------------------------------------------------------|
| Greenfield 3G/4G (Macro)                      | ~1,400,000 – 1,600,000 | Broadly consistent with Annex A Macro figure (~1,502,397.52); includes tower, civils, power, backhaul |
| Rural Star (Annex A category, for comparison) | ~480,000 – 520,000     | For comparison against Annex A Rural Star figure (~502,816.17)                                        |
| WiFi Offload Site                             | ~80,000 – 150,000      | Access point + light backhaul (satellite/microwave), minimal civils; suited to very low-density areas |

These figures are indicative only; Telikom would refine them with NICTA once specific site technical requirements and backhaul availability are confirmed.

## 14. Closing

Telikom appreciates NICTA's ongoing commitment to transparent, evidence-based consultation on the UAS Programme, and looks forward to continued engagement as the 2027 Programme is finalised.

Yours sincerely,



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