

10 April 2018

Internet Society Namibia Chapter

Having a broadband policy is the way to go, big congratulations to the government for leading this policy formulation process.

Having had sought input, here are the Internet Society Namibia Chapter's inputs based thorough analysis of this policy. These are our recommendations

We made some observations and we made our recommendation thereafter.

Page iii**(SIP 2018 – 20223)****We recommend that this is changed to (SIP 2018 – 2023)**

There is a mention of the development of this National Broadband Policy and Associated - IAP.

Input

We recommend that IAP is fully explained from the onset and it should also be added to the list of acronyms.

We recommend that all other stakeholders are such as NGOs are acknowledged just as others.

Page viii

Opening sentence -... foreseeable future as Information Technology

We recommend the latter is changed to Information and Communication Technology

Input:

We recommend that E-wastage is included in this policy at this early stage.

Page 4

On the Rationale ... key issues such as access, affordability, quality and usage.

Input:

We recommend that : availability is added as a key issue to those mentioned above.

Page 5

3.2 Cross Border Commitment

Input:

We recommend that: (iii) Broadband Commission is fully mentioned as UN Broadband Commission

Page 6

3.3 Broadband Definition

Input:

We recommend that: ... broadband definition for this policy should be aligned 1) this policy's glossary definition on page xiii states that the bandwidth is higher than 2Mbps. 2) Align this definition to the latest UN Broadband' s definition.

Page 10

7.1 Broad broadband Policy Targets

Input:

We recommend that: Target #7 is realised earlier as adopted to 2020

Target #6 is totally removed as it is not a target mentioned SADC Ministers decisions.

Page 11

8.2 Legal & Regulatory Arrangement

Input:

As a way of creating effective competition and growth in the domestic Internet access service market, an important factor in supporting growth of the sector is providing innovative licensing for hard to reach places, and community networks becomes an important alternative where business cannot reach. The broadband policy may as such provide an innovative spectrum licensing to encourage communities to develop their own networks.

Page 15

8.4 M&E framework reporting

Input:

We recommend that: The role of the National Broadband Steering Committee (NBSC) is defined earlier and differentiated from the National Broadband Commission. If it's the same entity, correction must be done.

Page 16

8.4.4 Quality of Broadband Service

Input:

We recommend that: At this stage we should have a local definition of "acceptable quality" definition.

Page 17

Role of Stakeholders

Input: There is a need for provision for multi-stakeholder oversight. The composition of the National Broadband Steering Committee or National Broadband Commission should be clearly indicated. A multi-stakeholder oversight gives responsibilities to all to measure and suggest compliance with the target.

Page 18

Role of Stakeholders

Input:

We recommend that: vi) Consumer organisations be rephrased to be more inclusive beyond demanding. The policy provides a list of stakeholders but their roles are not very clear. Secondly, the technical community (ISOC, Internet Registries, IXP,) is missing. This community could be summed under CSOs but a separation maybe important. The technical community is better placed to advice other stakeholders on emerging issues and how to technically secure the Internet. (we can propose a few responsibilities for the technical community here) In addition, vi) We also recommend that

- Creating awareness
- Involved "M&E" of the IAP
- Drive demand content creation

And finally, The Broadband policy does not make reference or policy support to critical Internet infrastructure such as the Internet Exchange Points¹. It's important to note that the Broadband Commission puts IXPs at the centre of broadband growth. As such, the policy should promote, in compliance with the policies of Namibia, the establishment or strengthening, if existing the sub-regional and national IXPs that represent an alternative to reduce the costs of broadband and ensuring a direct flow without the need for recourse to international circuits; Internet Exchange Points (IXPs), are an important form of support infrastructure which can potentially help reduce latency, and cut transit costs and should be highlighted in the policy.

Page 18

9.1 National Imperative to Succeed

Input:

We recommend that: ...proper planning/reviewing the National Broadband Policy (NBP) delivery plan...be contextualised within the language of the policy, by either IAP is used here or define Delivery plan. The latter seem to be a new concept all together

Page 19.

9.1 Demand Side of Broadband

Input:

We recommend that:

In i) – In many countries including Mauritius one of the ICT leading countries in the regional block, as well Botswana, an ICT hub has been prioritised as a place for developing E-applications, creating local content and ensured sustainability.

Hence it's important that this policy & IAP prioritises an ICT Hub for local developers, innovators and content creators in order to effectively utilise broadband and ensure ICT uptake.

In ii) We hereby sharing the Alliance For Affordable Internet (A4AI) 's "1 for 2" target for affordable internet which stipulates that - 1GB of mobile broadband data available for 2% or less of GNI per capita. ⁱⁱ This strategy has been adopted as the new affordability target by the United Nations in January 2018.

The "1 for 2" target aims at enable all levels of income earners across low- and middle-income countries to afford a basic internet connection. This target has previously been endorsed by Nigeria, Ghana and the Economic Community of West African States (ECOWAS). In this regard Namibia can be leading in the SADC region with the adaptation of this now UN strategy.

Page 19.

9.1 Supply side of Broadband

Input: We recommend: In ii) that Net neutrality is added to ...technology and service neutrality

Page 22:

12. Strategic Mapping

Input:

We recommend that:

12.1 Connectivity and Divices Row – An additional action point be added on Demand creation for locally-made ICT devices.

12.1 In Finance and Investment – Action plan. USF is supported through a multi-stakeholder model of oversight.

Additionally – We recommend that the local Uranium goes through a beneficiation process to encourage local usage of Uranium for manufacturing ICT handsets pieces.

In our conclusion, we therefore recommend that a multi-stakeholder monitoring and evaluation system is prioritised to ensure compliance based on set milestones. Based on international practices, we highly recommend academia, media and civil society inclusion from the start. In addition this approach ensures that academia should not just be beneficiaries but have the opportunity for independent feedback from use and research.

ⁱ <https://www.internetsociety.org/policybriefs/ixps/>

ⁱⁱ <http://a4ai.org/un-broadband-commission-adopts-a4ai-1-for-2-affordability-target/>