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3 March 2020

TO: INDEPENDENT COMMUNICATIONS AUTHORITY OF SOUTH AFRICA
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SUBMISSION BY MEDIA MONITORING AFRICA:

**DISCUSSION DOCUMENT ON THE MARKET INQUIRY INTO MOBILE BROADBAND SERVICES IN
SOUTH AFRICA**

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INTRODUCTION

1. Media Monitoring Africa (MMA) welcomes the opportunity to provide this submission on the Discussion Document on the Market Inquiry into Mobile Broadband Services in South Africa (Discussion Document), conducted by the Independent Communication Authority of South Africa (ICASA). We note the important purpose of the inquiry in assessing the state of competition in the telecommunications industry and determining whether there are markets or market segments within the mobile broadband service value chain which warrant regulation. Further, we are of the view that the inquiry and the Discussion Document have the potential to contribute positively to broader public initiatives that are aimed at ensuring universal access to broadband services for all persons in South Africa.
2. This submission focuses on the importance of access to telecommunications to enable the full enjoyment of fundamental rights and the need for a right-based approach in the finalisation and implementation of the findings and recommendations made by ICASA, in respect of regulating the mobile broadband services industry. The purpose of this submission is to highlight several key aspects that MMA submits should properly be dealt with in the Discussion Document, but have not found appropriate reference. Accordingly, this submission sets out the following five recommendations:
 - 2.1. **Recommendation I:** The need to set out clear overarching objectives in the Discussion Document.
 - 2.2. **Recommendation II:** The need to adopt a rights-based approach in the public interest to guide the Discussion Document.
 - 2.3. **Recommendation III:** The need to align the Discussion Document with the findings and recommendations of the Competition Commission.
 - 2.4. **Recommendation IV:** The need to address the lack of coordination in matters pertaining to internet governance.
 - 2.5. **Recommendation V:** The need to address the challenges in the assignment of spectrum.
3. These are dealt with in turn below.

OVERVIEW OF MEDIA MONITORING AFRICA

4. MMA is a not-for-profit organisation that has been monitoring the media since 1993. MMA's objectives are to promote the development of a free, fair, ethical and critical media culture in South Africa and the rest of the continent. The three key areas that MMA seeks to address through a human rights-based approach are media ethics, media quality and media freedom.

5. MMA aims to contribute to this vision by being the premier media watchdog in Africa. MMA has over 20 years' experience in media monitoring and direct engagement with media, civil society organisations, State institutions and citizens. MMA is the only independent organisation that analyses and engages with media according to this framework. In all of our projects, we seek to demonstrate leadership, creativity and progressive approaches to meet the changing needs of the media environment.
6. For more information about MMA, please visit: www.mediamonitoringafrica.org.

RECOMMENDATION I: NEED TO SET OUT CLEAR OVERARCHING OBJECTIVES SET OUT IN THE DISCUSSION DOCUMENT

7. MMA is concerned that the Discussion Document does not set out the overarching objectives that are sought to be achieved through this process. In particular, MMA submits that ICASA – with its mandate to connect the unconnected – should make clear in the Discussion Document that the overarching objective is to achieve universal access to broadband services for all persons in South Africa.
8. Furthermore, we submit that, in setting this as the overarching objective, regard must also be had to how ICASA defines the term “access”. As noted by the Association for Progressive Communications, the following facets of access must therefore be considered:¹
 - 8.1. Inequalities in access are more prominent in disadvantaged groups, particularly women, children, cultural minorities, people living on remote islands, and in least developed countries (LDCs).
 - 8.2. Limited coverage and slower internet speeds are more prominent in rural areas. In LDCs, this is often also a hallmark in peri-urban areas, particularly ones in which there are information settlements and weak local government institutions.
 - 8.3. Access is less favourable to users on mobile networks, where broadband speeds are comparatively low and subject to metered access, traffic caps, and high costs.
 - 8.4. Ownership structures in broadband and broadcast media face limited competition and, coupled with concerns around net neutrality, this creates complications for the free flow of information, the diversity and plurality of content and its dissemination in local languages, and the conditions of access to service provision.
 - 8.5. Challenges relating to access are closely aligned to broader social issues, including poverty, exclusion, cultural norms, education, ICT competencies, and buying power.

¹ Association for Progressive Communications, 'Ending digital exclusion: Why the access divide persists and how to close it', April 2016, https://www.apc.org/sites/default/files/EndingDigitalExclusion_dig.pdf.

9. MMA's call for ICASA to make clear that the overarching objective of the Discussion Document is to achieve universal access to the internet coheres with South Africa's international and domestic obligations in this regard. For example:

9.1. Article 19(2) of the International Covenant on Civil and Political Rights (ICCPR) provides that "[e]veryone shall have the right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print, in the form of art, or through any other media of his choice." General Comment No. 34 to the ICCPR expands on article 19(2) of the ICCPR, and provides that:

"States parties should take account of the extent to which developments in information and communication technologies, such as internet and mobile based electronic information dissemination systems, have substantially changed communication practices around the world. There is now a global network for exchanging ideas and opinions that does not necessarily rely on the traditional mass media intermediaries. States parties should take all necessary steps to foster the independence of these new media and to ensure access of individuals thereto."

9.2. Goal 9.c of the United Nations' 2030 Sustainable Development Goals (SDGs) seeks to "significantly increase access to information and communications technology and strive to provide universal and affordable access to the Internet in least developed countries by 2020". Moreover, goal 5.b of the SDGs further seeks to "enhance the use of enabling technology, information and communications technology, to promote the empowerment of women".

9.3. Resolution 32/13 of the United Nations Human Rights Council has committed all states "to consider formulating, through transparent and inclusive processes with all stakeholders, and adopting national Internet-related public policies that have the objective of universal access and enjoyment of human rights at their core".

9.4. Chapter 4 of the National Development Plan (NDP), which deals with economic infrastructure, contains a section dealing specifically with information and communications infrastructure. This section identifies there as being "[a]n immediate policy goal to ensure that national ICT structures adequately support the needs of the economy, allowing for parties beyond the public sector to participate". The NDP set out its overall vision for ICTs in South Africa as follows:

"By 2030, ICT will underpin the development of a dynamic and connected information society and a vibrant knowledge economy that is more inclusive and prosperous. A seamless information infrastructure will be universally

available and accessible and will meet the needs of citizens, business and the public sector; providing access to the creation and consumption of a wide range of converged services required for effective economic and social participation – at a cost and quality at least equal to South Africa's main peers and competitors. Within this vision, the underlying ICT infrastructure and institutions will be the core of a widespread digital communications system. This ecosystem of digital networks, services, applications, content and devices, firmly integrated in the economic and social fabric, will connect public administration and the active citizen; promote economic growth, development and competitiveness; drive the creation of decent work; underpin nation building and strengthen social cohesion; and support local, national and regional integration. Public services and educational and information products will be accessible to all, and will build on the information, education and entertainment role envisaged for public broadcasting. The human development on which all this is premised will have created an e-literate (online) public able to take advantage of these technological advances and drive demand for services.”

- 9.5. South Africa Connect, published by the Department of Communications (as it then was) in terms of section 3(1) of the Electronic Communications Act 36 of 2005, sets out specific targets for the achievement of universal access in South Africa. Importantly, it commits that by 2030, 100% broadband access will be achieved at a speed of 10Mbps for all users in South Africa. It also commits to achieve 100% broadband access at a speed of 1Gbps in all schools and health facilities, and 100% broadband access at a speed of 100Mbps in all public sector facilities.
10. In the light of the commitments that have already been made by South Africa to achieve universal access to broadband services for all persons in South Africa, it would therefore be appropriate – and necessary – for ICASA to similarly make such a commitment in the Discussion Document, to make clear what the overarching purpose of this process will be. Clear targets, that may be progressively realised over time, should be set, and guidance provided on how ICASA foresees meeting these targets.
11. Further in this regard, we draw to ICASA’s attention to a report that was prepared by MMA, together with a coalition of organisations – the South African National Editors’ Forum, the Interactive Advertising Bureau of South Africa and the Association for Progressive Communications – that sets out a seven-point plan for achieving universal access to the internet and free public access in South Africa.² The seven-point plan proposes the following initiatives:

² Accessible at <https://internetaccess.africa/universal-access/>.

- 11.1. Free public access to the internet at government facilities.
 - 11.2. Zero-rated access to government websites.
 - 11.3. Free wi-fi in public spaces.
 - 11.4. Access to the internet as a basic municipal service.
 - 11.5. Digital literacy and skills development programmes.
 - 11.6. Minimum protections in the provision of free access to the internet.
 - 11.7. Oversight and monitoring of the progressive realisation of free access to the internet.
12. MMA urges ICASA to have regard to these recommendations and incorporate them, as appropriate, into the Discussion Document, as prospective measures for achieving universal access to broadband services for all persons in South Africa. Key aspects of the seven-point plan are also dealt with in further detail below.

RECOMMENDATION II: NEED TO ADOPT A RIGHTS-BASED APPROACH IN THE PUBLIC INTEREST TO GUIDE THE DISCUSSION DOCUMENT

13. As mentioned, MMA is concerned that the Discussion Document does not approach the issue of universal access to broadband services from an explicitly rights-based approach in the public interest. As such, MMA urges ICASA to revisit this in the update to the Discussion Document and its strategy going forward, to ensure that this is properly addressed.
14. ICASA, as an organ of state, is constitutionally mandated to respect, protect and promote the rights contained in the Constitution of the Republic of South Africa, 1996 (the Constitution). Particularly, ICASA is urged to expressly recognise the role that access to broadband services plays in the realisation of full array of fundamental rights, including the right to receive and impart information. As has been noted by the Constitution Court:³

“Freedom of expression lies at the heart of democracy. It is valuable for many reasons, including its instrumental function as a guarantor of democracy, its implicit recognition and protection of the moral agency of individuals in our society and its facilitation of the search for truth by individuals and society generally. The Constitution recognises that individuals in our society need to be able to hear, form and express opinions and views freely”.

15. In the current digital era, the right to receive and impart information is inextricably linked to access to broadband services. As has been noted by the Zimbabwean Supreme Court,

³ South African National Defence Union v Minister of Defence and Another 1999 (4) SA 469 (CC) at para 7.

“[r]estriction upon or interference with the means of communication, whatever form it may take, abridges the guarantee of freedom of expression. A fortiori any monopoly which has the effect, whatever its purpose, of hindering the right to receive and impart ideas and information, violates the protection of this paramount right”.⁴

16. In particular, access to broadband services plays an important role in, for example, disseminating information and ideas, expressing dissent, engaging in political discourse, mobilising communities, accessing banking facilities and facilitating the right to education. Those who are unable to access telecommunication services are negatively impacted in their ability to fully enjoy these rights. This has also been recognised by South Africa in various policy commitments, including the following:

16.1. In South Africa Connect, it was recognised that “[t]his policy gives effect to the Constitution of South Africa by creating the conditions in a modern electronic world to improve the quality of life of all citizens and free the potential of each person and, in doing so, enables equality in the rights, privileges and benefits of citizenship, including the guarantees of freedom of expression and association in the Bill of Rights. This aligns with the declaration by the Human Rights Council of the United Nations General Assembly that access to the internet is a basic human right which enables individuals to ‘exercise their right to freedom of opinion and expression.’”

16.2. Similarly, the ICT Policy White Paper draws a direct link between the provision of ICTs and the demands of the Constitution, noting in its introduction, with reference to the preamble of the Constitution, that it is premised on “furthering the constitutional objective of improving ‘the quality of life of all citizens’ and freeing ‘the potential of each person’”. It further emphasises the interplay between access to the internet and the constitutional right to equality:

“Equality and the right of everyone to ‘full enjoyment’ of all opportunities in South Africa underpin all rights and freedoms enshrined in the Constitution. This founding law further compels Government to proactively intervene to address any inequality. In line with this constitutional injunction, this White Paper introduces a range of interventions to ensure that everyone in South Africa, regardless of who they are, where they live or their socio-economic status can improve the quality of their lives through accessing the benefits of participating in the digital society.”

17. MMA submits that this rights-based approach should similarly be followed by ICASA in the Discussion Document and its strategy going forward. There is a constitutional imperative on ICASA to recognise the interplay between universal access to broadband services and the realisation of fundamental rights. MMA submits that the failure to do so would risk the Discussion Document becoming a hollow vehicle that does not approach this issue of public

⁴ Retrofit (Pvt) Ltd v Posts and Telecommunications Corporation 1995(2) ZLR 199 (S) at p 503.

interest and national importance through the appropriate lens. Further, the failure to adopt a rights-based approach, or to place the public interest at the core, raises the question: in whose interest is the regulator acting? There are simply too many competing interests and vested powerful stakeholders in the sector where, unless the regulator is explicit about its public interest mandate, it may open itself to allegations – fair or otherwise – that it may be serving a vested set of interests.

RECOMMENDATION III: NEED TO ALIGN THE DISCUSSION DOCUMENT WITH THE FINDINGS AND RECOMMENDATIONS OF THE COMPETITION COMMISSION

18. On 2 December 2019, the Competition Commission published its final report on the Data Services Market Inquiry. MMA has welcomed the findings and recommendations, and broadly shares the Competition Commission’s view that “[t]he full implementation of this package of remedies will not only lower prices for all consumers, and particularly the poor, but will lead to greater economic and social inclusion moving forward as the country moves into the digital age. The full implementation of the package of remedies is also essential to provide the necessary building blocks for South Africa to participate fully in the Fourth Industrial Revolution and take advantage of the opportunities that revolution presents.”
19. As you will be aware, the Competition Commission made specific recommendations in respect of ICASA, which included the following:
 - 19.1. That ICASA be required to regulate the mobile operators in order to give effect to the recommendation that all prepaid subscribers must be afforded a “lifeline package of daily free data”.
 - 19.2. That ICASA must provide formal regulatory status to the recommendation that mobile operators must afford all subscribers zero-rated access to content from public benefit organisations and educational institutions.
 - 19.3. That ICASA should provide formal regulatory status to the recommendation that all mobile operators must inform each subscriber, on a monthly basis, of the effective price for all data consumed by the customer.
 - 19.4. That there be continued engagement with ICASA on the processes for the provision of high demand spectrum.
 - 19.5. That ICASA undertake the process of defining what constitutes essential facilities to a customer in respect of mobile broadband services, in the context of setting pricing standards for such facilities.
 - 19.6. That ICASA be empowered by legislative amendments to regulate roaming, mobile virtual network operators (MVNOs) and wholesale access agreements in line

minimum pricing standards.

- 19.7. That ICASA reinstates the regulatory accounting reporting requirement for Vodacom, MTN and Telkom Operators.
- 19.8. That ICASA considers models and regulatory changes to allow at least non-profit community networks, and possibly small commercial enterprises, to access the licenced spectrum not used by mobile operators in rural areas.
20. While MMA appreciates that the publication of the Discussion Document pre-dates the final report of the Competition Commission, MMA is concerned that these issues are not appropriately addressed in the Discussion Document, and that there has not been sufficient provision made for alignment between the Discussion Document and the report of the Competition Commission. This leads to uncertainty and a lack of clarity on ICASA's views regarding the Competition Commission's findings and recommendations.
21. In particular, in line with the seven-point plan outlined above, MMA urges ICASA to address the following issues in the Discussion Document:
 - 21.1. That ICASA compliment the recommendation of the Competition Commission that all mobile operators reach agreement to offer all prepaid subscribers a lifeline package of daily free data to ensure all citizens have data access on a continual basis, regardless of income levels, which is to be formal legislative or regulatory effect within six months. While the Competition Commission has indicated that ICASA is one of the stakeholders to be consulted in the determination of the precise level to be offered, the Discussion Document does not address this issue, or how what steps ICASA will take to guarantee that this is sufficient to ensure each citizen's participation in the online economy and society.
 - 21.2. That ICASA compliment the recommendation of the Competition Commission regarding the zero-rating of content from public benefit organisations and educational institutions. ICASA does not appropriately address this issue in the Discussion Document, including how this will be practically attained with operators, what principles and criteria will be applied, or how greater zero-rated access to content in African languages will be ensured.
 - 21.3. That ICASA compliment the recommendation of the Competition Commission regarding the development of alternative infrastructure to provide data services. As noted by the Competition Commission, the development of alternative infrastructure to provide data services in lower-income areas, as well as smaller secondary cities and towns nationally, will provide off-load opportunities from the mobile networks to free or lower-priced public wi-fi services. Further, the Competition Commission recommended that the government should actively promote the development of free

public wi-fi in low-income areas, as well as the creation and entry of community networks, with an ultimate objective of every municipality providing free and affordable wi-fi services in public areas within the boundaries of the municipality. In this regard, the Competition Commission called for ICASA to consider models and regulatory changes to allow non-profit community networks, and possibly small commercial enterprises, to access licensed spectrum not used by mobile operators in rural areas. However, the Discussion Document does not appear to deal directly with these issues, or its role in facilitating the realisation of the Competition Commission's recommendations in this regard.

22. There is one key aspect from the seven-point plan that MMA submits the Competition Commission was remiss in not addressing: the need for media and information literacy programmes to ensure that users are safe online. MMA urges ICASA to address this issue as a priority in the Discussion Document. MMA submits that the value of getting people online is significantly diminished unless they are safe when doing so. This requires appropriate measures to be taken to secure the relevant networks, as well as the implementation of media and information literacy programmes to ensure that users can guard against potential online threats and harms. This should, in particular, be focused on persons who have had limited access to the internet in the past, such as children and the elderly, and should be seen as a priority within the overall plan to achieve universal access to broadband services. Added to this, the personal information of users should not be exploited in the provision of broadband services. Users should be sufficiently empowered to realise the full developmental potential that the internet can offer, and realise the maximum benefits that lie before them.

RECOMMENDATION IV: NEED TO ADDRESS THE LACK OF COORDINATION IN MATTERS PERTAINING TO INTERNET GOVERNANCE

23. MMA notes that there is currently significant uncertainty and inconsistency in the executive and legislative frameworks that need to be considered when dealing with internet governance, including issues pertaining to universal access to broadband services. This includes the following:
 - 23.1. The Department of Communications and the Department of Telecommunications and Postal Services have been merged, but this has yet to be streamlined.
 - 23.2. The Minister of Communications and Digital Technologies has announced the merger of ICASA with the Films and Publications Board and the .ZA Domain Name Authority, but has not provided any clarity on when or how this will be implemented.
 - 23.3. The Electronic Communications Amendment Bill has been withdrawn from Parliament for further consultations, but it remains uncertain whether it will be revived.

- 23.4. The Cybercrimes Bill remains pending before Parliament, with no clarity when this will be finalised or signed into law.
- 23.5. The Protection of Personal Information Act 4 of 2013 has been signed into law, but the substantive provisions have yet to be brought into force.
24. MMA submits that there is an urgent need for better coordination among the relevant stakeholders that have a role to play in internet governance. The existing conflation of roles amongst various stakeholders – and the various structural and institutional challenges they face – lends further weight to the need for coordination.
25. It is undeniable that there is a lack of any overarching governance policy on how current and proposed legislation that deals with information and digital rights regulation is to be managed by the different role-players or on how coordination amongst the various role-players is to function. In the absence of a clear government policy and legislative guidance, an unduly complex structure of oversight is in the process of being created.
26. The result is that that people in South Africa, civil society organisations, and members of the media, among others, need to navigate an overly complex regulatory landscape in order to engage in public participation, make submissions, conduct their business, and, ultimately, defend and protect their information rights. Additionally, this poses significant challenges to government’s coordinated and effective implementation of the existing regulatory provisions and may result in overlapping mandates or aspects not being assigned or accounted for by appropriate functionaries.
27. A further constitutional consideration relates to cooperative governance and intergovernmental relations. In terms of section 41(1)(c) of the Constitution “all spheres of government and all organs of state within each sphere must provide effective, transparent, accountable, and coherent government for the Republic as a whole” and they must “co-operate with one another in mutual trust and good faith by coordinating their actions and legislation with one another”.
28. Accordingly, MMA has called for the establishment of an Interdepartmental Steering Committee (ISC) on Internet Governance to address relevant matters, including access to the internet. It is proposed that the ISC be led by the Department of Justice, and also comprise representatives from the following role-players:
 - 28.1. Independent Communications Authority of South Africa;
 - 28.2. Department of Justice and Constitutional Development;
 - 28.3. Department of Communications and Digital Technologies;
 - 28.4. Department of Home Affairs;
 - 28.5. Department of International Relations and Cooperation;

- 28.6. Department of Science and Technology;
 - 28.7. Financial Intelligence Centre;
 - 28.8. National Prosecuting Authority;
 - 28.9. National Treasury;
 - 28.10. South African Police Service;
 - 28.11. South African Revenue Service;
 - 28.12. State Security Agency;
 - 28.13. Information Regulator;
 - 28.14. Two representatives from opposition parties represented in the National Assembly;
 - 28.15. Two teachers of law, or members of the legal profession with knowledge of internet governance law, appointed following a public call for nominations;
 - 28.16. Two technical experts in internet governance following a public call for nominations
 - 28.17. Two members of civil society organisation working on internet governance following a public call for nominations.
29. MMA submits that ICASA has a real and meaningful opportunity through the Discussion Document to call for better coordination, in the interests of clarity and certainty in the realm of internet governance, which is critical to the achievement of universal access to broadband services for all persons in South Africa. Added to this, as a component of better coordination, it is also important that provision be made for the monitoring and oversight of the recommendations to achieve universal access to broadband services.

RECOMMENDATION V: NEED TO ADDRESS THE CHALLENGES IN THE ASSIGNMENT OF SPECTRUM

30. MMA has long-since expressed concerns about the delays in digital migration and the release of high-demand spectrum and the broader impact this has had on customers, the telecommunications industry and the economy. The Ministry of Finance has indicated that “the delay in digital migration and the spectrum allocation process is the single biggest constraint in the growth of the telecommunications sector and is a bottleneck for broader economic growth⁵”. Conservative spectrum allocation has restricted the potential for increased competition in the market.
31. The advent of 5G spectrum bands to the global market makes the need for high demand spectrum even more pressing. The Broadband Commission for Sustainable Development has noted that 5G spectrum bands will enable full use of artificial intelligence, cloud computing and data analytics. These advances will have an exponential impact on the global economy, and there is an urgent need for South Africa to keep pace.
32. South Africa’s national broadband policy was developed in 2013 and is in need of revision to

⁵ Ministry of Finance, ‘Economic transformation, inclusive growth and competitiveness’, September 2019, http://www.treasury.gov.za/comm_media/press/2019/Towards%20an%20Economic%20Strategy%20for%20SA.pdf

stay up to date. The greater allocation of spectrum will empower initiative such as community networks, which have proven themselves successful in the advancement of universal access to broadband services.

33. Furthermore, the wholesale open access network (WOAN) has been touted as a solution to the anti-competitiveness of the telecommunications sector. WOAN will lead to the reservation of spectrum allocation to allow for new entrants into the market. There remains, however, uncertainty as to how this will work in practice, and President Ramaphosa indicated in his State of the Nation Address that this clarity is unlikely to be found anytime in the near future.
34. MMA is concerned that these critical issues regarding the assignment of spectrum have not been appropriately addressed in the Discussion Document. These issues have a direct and pressing impact on the achievement of universal access to broadband services. The Discussion Document must necessarily address these issues directly and comprehensively, as they are critical to the full understanding of how ICASA intends to achieve universal access to broadband services for all persons in South Africa.

CONCLUDING REMARKS

35. Access to the broadband services has become central to the exercise and enjoyment the full array of fundamental rights and freedoms. All people with access to online information, including those in remote and marginalised communities, can enjoy the benefits of being able to receive and impart this information, learn, associate, educate and innovate. In doing so, they are able to protect and exercise their rights and realise their potential. Conversely, those without access are deprived of such protection and enjoyment. Regardless of whether one classifies the internet as an enabler of rights or a self-standing right in and of itself, the power and importance of access to broadband services cannot be gainsaid.
36. It is on this basis that MMA has put forward the five recommendations contained in this submission, in pursuance of achieving universal access to broadband services for all persons in South Africa. In doing so, any inquiries related to access to broadband services must go beyond questions of mere coverage, and delve into the complex, inter-related matters of availability, affordability and acceptability of access to broadband services and online information.
37. MMA remains available to assist and contribute further to the processes relating to the Discussion Document, including to present oral submissions at any public hearings and to make further written submissions on amended drafts of the Discussion Document. Please do not hesitate to contact us should you require any further information.