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REPUBLIC OF NAMIBIA

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CONTENTS

Page

GENERAL NOTICE

No. 157	Communications Regulatory Authority of Namibia: Notice of intention for Determination of Dominant Position in the Telecommunications Market	1
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General Notice

COMMUNICATIONS REGULATORY AUTHORITY OF NAMIBIA

No. 157

2024

NOTICE OF INTENTION FOR DETERMINATION OF DOMINANT POSITION IN THE TELECOMMUNICATIONS MARKET

The Communications Regulatory Authority of Namibia in terms of section 78(1) of the Communications Act, 2009 (Act No. 8 of 2009) and regulation 4 of the Regulations regarding rule-making procedures published as General Notice No. 334 of 17 December 2010 (hereafter “the Regulations regarding rule-making procedures”) publishes this notice of intention to make a Determination of Dominant Position in the Telecommunications Market, which contains the following:

A draft Determination of Dominant Position in the Telecommunications Market as set out in the Schedule.

The Authority in terms of regulation 7 of the Regulations regarding rule-making procedures further gives notice herewith that it will hold a public hearing regarding the proposed Market Study as follows:

DATE: 26 April 2024

TIME: 09h00

VENUE: TBC

Members of the public are invited to make oral submissions at the aforesaid public hearing subject to the following:

1. Any person desirous to make oral submissions at the aforesaid public hearing must deliver written notice thereof to the Authority not later than 10 days before the date of the hearing. Such written notice must be accompanied by concise statement setting out the basis and rationale of the oral submissions.
2. Oral submissions made at the aforesaid public hearing must –
 - (a) Include a statement of the name and contact details of the person making the oral submissions and the name and contact details of the person of entity on whose behalf the oral submissions are made, if different;
 - (b) Be clear and concise.
3. The aforesaid notice of oral submissions and concise statement must be delivered to the Authority either physically or electronically as follows:
 - (a) By hand to the head offices of the Authority, namely Communications House, 56 Robert Mugabe Avenue, Windhoek;
 - (b) By post to the head offices of the Authority namely Private Bag 13309, Windhoek;
or
 - (c) By electronic mail to the following address legal@cran.na.

Members of the public or any parties affected by the finding in the Schedule are further invited to make written submissions to the Authority no later than 30 days from the date of publication of this Notice, in the manner set out below for making written submissions.

Reply comments to written submissions may be submitted to the Authority –

- (a) no later than 15 days after the time for the making of written submissions has lapsed;
or
- (b) if the opportunity for the submission of reply comments is published in a subsequent *Gazette*, after the lapse of 14 days from the date of such publication.

All written submissions must –

- (a) contain the name and contact details of the person making the written submissions and the name and contact details of the person or entity on whose behalf the written submissions are made, if different; and
- (b) be clear and concise.

All written submissions must be delivered to the Authority in the manner provided above for the delivery of notices of oral submissions.

DR. T. MUFETI
CHAIRPERSON, BOARD OF DIRECTORS
COMMUNICATIONS REGULATORY AUTHORITY OF NAMIBIA

SCHEDULE

PROPOSED DETERMINATION OF DOMINANT POSITION IN THE TELECOMMUNICATIONS MARKET

The Communications Regulatory Authority of Namibia in terms of section 78(1) of the Communications Act, 2009 (Act No. 8 of 2009), intends to make a Determination of Dominant Position in the Telecommunications Market as set out in the Schedule.

1. Introduction

Telecommunications is an increasingly important enabler of human development and economic growth. CRAN's approach to the determinations of 2012 and 2016 has been one of minimal intervention. In order to determine dominance in the market, it is important to define the relevant market in discussion. Dominance is described as the power that enables an operator to make a decision and to act independently of its competitors and customers in a specific market. This means that an operator is in such a position that they can adjust prices without a concern or fear of the competitors within the same market having an advantage and typically taking on more customers.

The adopted approach of 2012 aimed at minimising the burden on licensees while allowing CRAN to implement the objects of the Act. At the time of such study, there were only two markets defined at namely the telecommunication services and broadcasting services. This dominance was only declared for the telecommunications service market and Mobile Telecommunications Limited of which Powercom (Pty) Ltd t/a Leo and Telecom Namibia Limited were declared dominant¹. However, as the development in the industry progressed a need rose for all markets to be considered. This encourage sustainable investment, growth and innovation to the benefit of the entire Industry and its consumers, and it also acknowledges that existing market conditions may preclude effective competition in certain market segments. The 2016 determination defined four priority markets as listed in Table 1 below².

Table 1: Proposed Market Definitions for 2024 (unchanged to previous market definitions)

Markets		Description
1	Fixed and Mobile Call Termination	The market for fixed and mobile call and SMS termination is a natural monopoly and all operators offering call termination are dominant operators.
2	Wired End-User Access	The market for wired end-user access includes retail and wholesale/reseller services provided via fibre or copper lines. Services in this market include fixed call origination xDSL, FTTx, local leads or tail ends for leased lines.
3	National Data Transmission	The market for National Data Transmission covers all forms of prearranged connectivity within Namibia excluding the end-user access section. It covers wholesale and retail services. Services included in this market are leased lines, Ethernet, SDH, PDH, ATM, microwave, national IP transit and services rendered at submarine cable landing stations.
4	Wireless End- User Access	The market for wireless end-user access includes retail and wholesale services, excluding call and SMS termination, delivered through mobile and fixed-wireless networks. It includes call and SMS origination as well as Internet access provided via mobile phone, dongle, wireless modem or router and Wimax

A more focused approach was considered in 2019 but challenged by written submissions from licensees. CRAN had proposed to define markets more narrowly. The proposal was to define the markets for wired and wireless end-user access as copper-based and mobile end-user access. The main objection to this approach was that these market definitions leave out several services that may require *ex-ante* regulation during the period 2020 to 2022, in particular, FTTx and fixed-wireless³.

¹ Namibian Government Gazette No. 5201, General Notice No. 167 dated 29 May 2013.

² Namibian Government Gazette No. 6054, General Notice No. 214 dated 28 June 2016.

³ Namibia Government Gazette No. 7156, General Notice No. 105 dated 27 March 2020.

The 2016 and 2021 determination defined four broad markets that covered the entire connectivity segments of the Internet value chain. In 2024, this approach is still suitable. Defining markets with more granularity would simply mean the same operators are dominant for these markets as well. CRAN thus proposes to retain the market definitions from 2021.

2. Legal Basis for Conducting the Study

The functions and duties of the Communications Regulatory Authority of Namibia (CRAN) are set out in the Communications Act, 2009 (Act No. 8 of 2009) (the Act). Section 5 of the Act mandates that the objects of CRAN are to regulate the communications industry in Namibia in accordance with the provisions of the Act. While section 2 of the Act lists the objectives of the Act amongst others as to ensure fair competition and consumer protection in the telecommunication sector, encourage local participation in the Communications Sector, and encourage private investment in the telecommunications sector. In terms of section 78(1) of the Act, CRAN is mandated to hold a hearing to determine which licensees hold a dominant position in the market. Section 78(4) of the Act empowers CRAN to determine whether a licensee is dominant in respect of any Namibian communications market. In determining whether a licensee is dominant, CRAN as per section 78(3) of the Act needs to take into account the following:

- (a) *The licensee in question has such a share of the market in the class of telecommunication services in question, that it is able to act independent of its competitors;*
- (b) *The licensee controls some infrastructure that is necessary for the provision of the service in question;*
- (c) *The licensee in question is dominant as provided in paragraph (a) or (b) in respect of a class of related services (which need not be telecommunications services) and the licensee can use that dominance to exercise power in the market for telecommunications services in question; or*
- (d) *The licensee in question has a position in a market in another country or a relationship with providers in another country that can be used to exercise market power in respect of the relevant class of telecommunications services in Namibia.*

3. Methodology

Regulation needs to be guided by the minimal intervention and proportionality principles. Telecommunications regulators around the world define markets and determine dominance in order to design the appropriate *ex-ante* regulations that promotes fair competition and thus affordable user prices and efficient investment. A consensus exists around two general principles for regulatory interventions (ITU, 2016): the minimal intervention and proportionality principles. The principle of minimal intervention limits interventions to market conditions where sustainable competition does not evolve naturally. The principle of proportionality requires that a regulatory intervention does not cost more than the benefits generated by it.

A forward-looking approach taking into account the geographic dimension and demand and supply substitution is recommended by EU. The European Union (EU, 2018) gives specific recommendations for market studies for national regulatory authorities (NRAs) of its member states which are displayed in Table 2.

Table 2: Market study recommendations by the European Union (Source: EU, 2018)

Principles	Description
Forward-looking	A market study should be forward-looking, and take into account not only the existing market conditions but also foreseeable market developments for the current review period.
Demand and Supply-side Substitution:	NRAs should consider demand-side and supply-side substitution when defining markets. Demand-side substitution defines a market for a group of products and services that could easily be switched by a consumer in response to a small but significant price increase. Supply-side substitution tests whether a small price increase results in a new market entrant.
Geographic	Demand and supply-side substitutions should be analysed along the geographical dimension.

The market study process consists of three steps. The concrete implementation of each of these three steps is handled differently by regulators around the world and needs to be subject to careful consideration of the local conditions including institutional arrangements, legal framework and sector-specific circumstances. Step one identifies and defines candidate markets, step two assesses whether a market requires regulatory consideration, ie declaring a market a priority market, and step three identifies operators in a market with significant market power.

Step 1: Identify and define candidate markets. In the first step, the ICT sector is analysed with respect to competition and overall performance. A larger number of markets may be defined and alternative market definitions analysed. This entails grouping products and services into markets based on their characteristics, prices and intended use, as well as geographic and functional considerations, for example, retail and wholesale.

Step 2: Determine whether markets should be considered for *ex-ante* regulation. In the second step, priority markets from a wider list of candidate markets, identified in Step 1, are selected that potentially require regulations. ITU (2016) defines three criteria to determine whether a market should be considered for *ex-ante* regulation.

1. High barriers to market entry exist;
2. The market structure does not tend towards effective competition; and
3. Competition law alone would not be enough to address potential market failure.

Step 3: Identify operators with significant market power (SMP). Step three declares which operators are dominant for a priority market. Operators that are dominant and can act independently from competitors are considered to have SMP. The various factors that could be considered for this study are listed in Table 3. The list from the European Union is the most extensive list. Not all factors will be applicable to all markets.

Table 3: Factors to be considered for determining SMP

	Factors
ITU 2016	Market share; control of essential facilities; barriers to entry; potential competition; easy access to financial resources; strength of the countervailing power of consumers; economies of scale; economies of scope and vertical integration
EU 2018	Barriers to entry, barriers to expansion, absolute and relative size of the undertaking, control of infrastructure not easily duplicated, technological and commercial advantages or superiority, absence of or low countervailing buying power, easy or privileged access to capital markets/financial resources, product/services diversification (for example, bundled products or services), economies of scale, economies of scope, direct and indirect network effects, vertical integration, a highly developed distribution and sales network, conclusion of long-term and sustainable access agreements, engagement in contractual relations with other market players that could lead to market foreclosure, and absence of potential competition

TRCA 2018	<ul style="list-style-type: none"> • The products or services that make up a specific market, as well as the geographic scope of that market. • The demand side substitutability, in order to measure the extent to which consumers are prepared or able to substitute other products or services for the products or services supplied by the licensee in question. • The supply-side substitutability, to determine the extent to which suppliers, other than the licensee in question, are able to supply products or services that provide a competitive alternative to consumers.
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The approach of previous market studies to determine SMP will be used in this study as well. The criteria for dominance of the 2012 and 2016 market studies were based on the empowerment under section 78(1) read with section 78(4) of the Act which provides for the criteria to determine dominance. The same criteria as legislated will be applied in this study.

Section 78(5) of the Act provides that CRAN must also consider the market power that may be exercised by a competitor of the licensee concerned in order to determine whether any of the matters referred to in section 78(4) of the Act will give the licensee concerned, market power.

Table 4: SMP in the markets

		Operator A	Operator B	...
1	The licensee in question has such a share of the market in the class of telecommunication services in question that it is able to act independent of its competitors.	(Yes/No)	(Yes/No)	(Yes/No)
2	The licensee controls some infrastructure that is necessary for the provision of the services in question?	(Yes/No)	(Yes/No)	(Yes/No)
3	The licensee has dominance in a related market and therefore is able to exercise power in the market for the telecommunications services in question	(Yes/No)	(Yes/No)	(Yes/No)
4	The licensee has a position in a market in another country or a relationship with providers in another country that can be used to exercise market power in respect of the relevant class of telecommunications services in Namibia?	(Yes/No)	(Yes/No)	(Yes/No)
Do the 4 criteria give the licensee the ability to exercise market power (Section 78(5))?		(Yes/No)	(Yes/No)	(Yes/No)
Declared Dominant		(Yes/No)	(Yes/No)	(Yes/No)

The assessment of dominance for each market will use Table 4, which checks for the four criteria spelled out in section 78(4) of the Act. A “Yes” in any of the four criteria would lead to the declaration of dominance for an operator if it allows the licensee to exercise market power (Section 78(5)).

Communications Act, 2009 (Act No. 8 of 2009)

Subject to subsection (5), the Authority must find a licensee to be dominant if it is of the opinion that –

- (a) the licensee in question has such a share of the market in the class of telecommunications services in question, that it is able to act independent of its competitors;
- (b) the licensee controls some infrastructure that is necessary for the provision of the services in question;
- (c) the licensee in question is dominant as provided in paragraph (a) or (b) in respect of a class of related services (which need not be telecommunications services) and the licensee can use that dominance to exercise power in the market for the telecommunications services in question; or

- (d) the licensee in question has a position in a market in another country or a relationship with providers in another country that can be used to exercise market power in respect of the relevant class of telecommunications services in Namibia.

The Authority must consider the market power that may be exercised by a competitor of the licensee concerned in order to determine whether any of the matters referred to in subsection (4) will give the licensee concerned market power as contemplated in subsection (4).

The Authority used several data sources to do the determination of dominance in the telecommunications market. Some of the data were either submitted late or in a format that was not compatible with CRAN's analysis tools. The Market Study is therefore outside of the statutory deadline of 2 February 2024.

4. National Data Transmission

The market for National Data Transmission covers all forms of prearranged connectivity within Namibia, excluding the end-user access section. It covers wholesale and retail services. The markets include any form of backhauling services for mobile operators, leased lines, Metro Ethernet, microwave, national IP transit, services rendered at submarine cable landing stations and relevant facilities.

Table 5: Market concentration in terms of km fibre routes (Source: CRAN UAS Portal February 2024)

Regions	Combined	MTC		Nampower		Paratus		Telecom Namibia	
	km	km	%	km	%	km	%	km	%
Karas	3,340.5	187.0	6%	1,201.8	36%	N/A	0%	1,951.7	58%
Erongo	2,547.7	203.6	8%	669.7	26%	410.0	16%	1,264.5	50%
Hardap	2,232.1	27.0	1%	294.9	13%	N/A	0%	1,910.3	86%
Kavango East	817.3	29.2	4%	465.5	57%	N/A	0%	322.6	39%
Kavango West	544.8	130.1	24%	164.4	30%	N/A	0%	250.3	46%
Khomas	1,776.0	41.6	2%	588.7	33%	153.9	9%	991.7	56%
Kunene	816.7		0%		0%	N/A	0%	816.7	100%
Ohangwena	332.6	137.1	41%	36.3	11%	N/A	0%	159.2	48%
Omaheke	1,353.4		0%	200.9	15%	207.1	15%	945.4	70%
Omusati	539.5	110.8	21%	172.0	32%	N/A	0%	256.8	48%
Oshana	317.1	134.1	42%	65.8	21%	34.8	11%	82.4	26%
Oshikoto	905.7	316.9	35%	295.5	33%	N/A	0%	293.3	32%
Otjozondjupa	2,624.3	437.5	17%	888.9	34%	171.7	7%	1,126.3	43%
Zambezi	571.7	7.4	1%	199.4	35%	72.5	13%	292.4	51%
Namibia	18,719.5	1,762.1	9%	5,243.8	28%	1,050.0	6%	10,663.6	57%

Namibia Power Corporation Ltd (Nampower) and Telecom Namibia Ltd, control more than 85% of Namibia's Fibre routes. NamPower has a market share of 28%, Telecom Namibia 57%, MTC 9% and Paratus 6% of fibre routes across the country.

Resellers buy bandwidth from fibre route owners and their end-user prices are downward limited by what they have to pay the fibre route owners. Resellers thus have limited market power.

Table 6: SMP in the market for National Data Transmission

		Telecom Namibia	NamPower	Paratus	MTC
1	The licensee in question has such a share of the market in the class of telecommunication services in question that it is able to act independent of its competitors.	Yes	No	No	No
2	The licensee controls some infrastructure that is necessary for the provision of the services in question?	Yes	Yes	No	No
3	The licensee has dominance in a related market and therefore is able to exercise power in the market for the telecommunications services in question	No	Yes	No	No
4	The licensee has a position in a market in another country or a relationship with providers in another country that can be used to exercise market power in respect of the relevant class of telecommunications services in Namibia?	No	No	No	No
Do the 4 criteria give the licensee the ability to exercise market power (Section 78(5))?		Yes	Yes	No	No
Declared Dominant		Yes	Yes	No	No

Determination: Based on the results of the study, the Authority hereby determines the following:

- (a) Telecom Namibia has 57% of the national fibre network and is able to act independent of its competitors and is thus dominant. Telecom Namibia also controls infrastructure that is necessary for provision of services and is able to exercise power in the market also making it a dominant operator.
- (b) NamPower has a market share of 28% in terms of fibre network. Given its extensive national fibre network and its importance as backhaul for other licensees therefore gives Namibia Power Corporation control of infrastructure that is necessary for provision of services and is able to exercise power in the market also making it a dominant operator.
- (c) MTC and Paratus are not dominant as per the aforementioned criteria, despite their newly built fibre routes with below 10% market share each.

5. Wireless End-User Access

The market for wireless end-user access includes mobile and fixed-wireless services. This market includes call and SMS origination as well as Internet access provided *via* mobile phone, dongle, wireless modem, wireless router or VSAT terminal.

Table 7: Wireless end-user access at the end of December 2023

	MTC		Telecom Namibia		Paratus		Other		Total	
	#	%	#	%	#	%	#	%		
Mobile Active SIM cards	2,148,562	83%	441,989	17%	6,069	0%	1,306	0%	2,597,926	99%
VSAT	42	3%	399	29%	485	36%	427	32%	1,353	0.0%
Fixed Wireless	2,083	13%	12,033	75%	134	1%	1,699	11%	15,949	0.61%
Other wireless		0%	26	1%	2,253	59%	1,512	40%	3,791	0.14%
Total Wireless	2,150,687	82%	454,447	17%	8,941	0.3%	4,944	0.2%	2,619,019	
Source:	CRAN Portal, February 2024									

Wireless End-user access is mostly mobile, with 99% service share. Other forms of wireless end-user access are insignificant. MTC's market share in subscriber terms was 82% at the end of 2023 and Telecom Namibia at 17%. Paratus does not yet have a significant number of wireless subscribers, only 0.3%.

Table 8: 4G Population coverage by region (Source: CRAN UAS portal February 2024)

Region	Combined	MTC	Paratus	Telecom Namibia
Karas	80%	80%	7%	49%
Erongo	95%	95%	37%	89%
Hardap	79%	79%	19%	57%
Kavango East	91%	91%	0%	49%
Kavango West	70%	70%	0%	10%
Khomas	98%	98%	33%	94%
Kunene	49%	49%	0%	21%
Ohangwena	94%	94%	0%	24%
Omaheke	64%	64%	0%	34%
Omusati	96%	96%	0%	9%
Oshana	99%	99%	6%	62%
Oshikoto	84%	84%	1%	20%
Otjozondjupa	78%	78%	20%	53%
Zambezi	92%	92%	0%	39%
Namibia	88%	88%	12%	49%

MTC has a national 4G population coverage of 88%. Telecom Namibia's 4G coverage stood at 49% in February 2024⁴.

Table 9: Assessment of Dominance for wireless End-user Access market

		Telecom Namibia	MTC	Paratus
1	The licensee in question has such a share of the market in the class of telecommunication services in question that it is able to act independent of its competitors.	No	Yes	No
2	The licensee controls some infrastructure that is necessary for the provision of the services in question?	Yes	Yes	No
3	The licensee has dominance in a related market and therefore is able to exercise power in the market for the telecommunications services in question	Yes	No	No
4	The licensee has a position in a market in another country or a relationship with providers in another country that can be used to exercise market power in respect of the relevant class of telecommunications services in Namibia?	No	No	No
Do the 4 criteria give the licensee the ability to exercise market power (Section 78(5))?		Yes	Yes	No
Declared Dominant		Yes	Yes	No

⁴ CRAN received updated RAN sites and antenna data from MTC in February 2024 that including the use of the newly awarded 800 Mhz spectrum range.

Determination: Based on the results of the study, the Authority hereby determines the following:

- (a) MTC has more than 82% market share and is therefore able to act independent of its competitors. MTC also operates a country-wide mobile network controlling infrastructure necessary for provision of telecommunications services. It is thus dominant.
- (b) Telecom Namibia's subscriber market share is 17% but it does operate a country-wide mobile network controlling infrastructure necessary for provision of telecommunications services and has market power through its national fibre network for mobile data and is therefore able to exercise power in the market. It is thus also dominant.

6. Wired End-User Access

The market for wired end-user access includes retail and wholesale/reseller services provided *via* fibre or copper lines. Services in this market include fixed call origination xDSL, FTTx, local leads or tail ends for leased lines.

Table 10: Wired end-user access subscribers in December 2023

	MTC		Telecom Namibia		Paratus		Other		Total
	#	%	#	%	#	%	#	%	
Landlines		0%	81,097	100%		0%		0%	81,097
xDSL		0%	70,809	100%		0%	28	0%	70,837
Fibre to the home	8,942	34%	8,030	30%	9,456	35%	235	1%	26,663
Leased Lines		0%	1,382	99%		0%	15	1%	1,397
ISDN		0%	16,990	100%		0%		0%	16,990
Metro Ethernet		0%	78	32%	167	68%		0%	245
Total Wired End users	8,942	5%	159,936	90%	9,456	5%	263	0%	178,597
Source:	CRAN Portal, March 2024								

Table 11: Assessment of Dominance for wired End-user Access market

		Telecom Namibia	MTC	Paratus
1	The licensee in question has such a share of the market in the class of telecommunication services in question that it is able to act independent of its competitors.	Yes	No	No
2	The licensee controls some infrastructure that is necessary for the provision of the services in question?	Yes	No	No
3	The licensee has dominance in a related market and therefore is able to exercise power in the market for the telecommunications services in question	Yes	No	No
4	The licensee has a position in a market in another country or a relationship with providers in another country that can be used to exercise market power in respect of the relevant class of telecommunications services in Namibia?	No	No	No
Do the 4 criteria give the licensee the ability to exercise market power (Section 78(5))?		Yes	No	No
Declared Dominant		Yes	No	No

Determination: Based on the results of the study, the Authority hereby determines the following:

- (a) Telecom Namibia's subscriber market share was 90% at the end of 2023 and such market share enables Telecom to act independent of its competitors. At the same time Telecom Namibia control some infrastructure in the wired end-user market to provide the service in question and is dominant in the wired end-user market. Telecom Namibia is thus the only dominant operator in this market.

7. Call & SMS Termination

The market for fixed and mobile call termination is a natural monopoly since only the operator owning the subscriber can terminate calls for that subscriber. All operators offering call termination are dominant operators.

1. Dominance Determination

Table 12: Dominance Determination

Market as Defined		Determination
1	National Data Transmission	Telecom Namibia, NamPower
2	Wired End-User Access	Telecom Namibia
3	Wireless End-User Access	MTC, Telecom Namibia
4	Fixed and Mobile Call & SMS Termination	All licensees offering call and SMS termination are dominant operators.

9. References

EU (2018). C 159/1, Guidelines on market analysis and the assessment of significant market power under the EU regulatory framework for electronic communications networks and services, [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018XC0507\(01\)&rid=7](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018XC0507(01)&rid=7).

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