

25 March 2026

The Chief Executive Officer

Universal Service and Access Agency of South Africa

Per email: usaf-manual@usaasa.org.za | ceo@usaasa.org.za

Dear Sir

DRAFT USAF MANUAL – PUBLIC COMMENTS

1. ISPA refers to the publication of the Draft Universal Service and Access Fund (USAF) Manual for public comment in terms of section 88(1) of the Electronic Communications Act 36 of 2005 (the ECA) and sets out its submissions below.
2. ISPA's assessment is that the document published does not fall within what is generally regarded as a "manual". The draft document does little more than restate the provisions of the relevant sections of the ECA and in ISPA's view there is little substance to this process.
3. This is in contrast to the draft document published for comment on 25 November 2025, which canvassed in detail both the policy framework and funding principles governing disbursements from the USAF as well as operating guidelines and implementation procedures.
4. ISPA hopes that this content will be included in the procedural guidelines which the Agency indicates will be issued separately under section 88(1A) of the ECA.
5. As such ISPA is unable to identify the value of this draft document other than insofar as it sets out some generic guiding principles for funding interventions. ISPA has no objection to these guiding principles.
6. The Agency will also appreciate that the disbursement of USAF funds needs to be evidence-based and that the finalisation of this process and/or procedural guidelines in isolation will not mean the USAF is in a position to disburse subsidies and grants.
7. This requires the Agency, ICASA and the Minister respectively to complete the tasks assigned to them under Chapter 14 of the ECA. These tasks include:
 - 7.1. ICASA updating the prescribed definition of under-serviced area and the list of designated under-serviced areas eligible for construction payments from the USAF as required by subsection 88(3).
 - 7.2. The Agency making recommendations to enable the Minister to determine by notice in the Gazette the types of needy persons to whom assistance may be given; the persons

who must apply for assistance; and persons to whom subsidies may be paid as required by subsection 88(4).

8. ISPA looks forward to engaging with the Agency on the detailed procedural guidelines when these are published for comment.

Regards

A handwritten signature in blue ink, consisting of a large loop followed by a series of connected, wavy lines.

ISPA