

13 October 2026

ICASA

Attention: Mr E Letlape

Per email: eletlape@icasa.org.za

NOTICE IN TERMS OF THE NUMBERING PLAN REGULATIONS: MANDATING SERVICE CODES DESIGNATED FOR PROVINCIAL GOVERNMENT SERVICES

1. ISPA refers to the above notice published for comment on 31 August 2026, and sets out below its submissions based on consultation with ISPA members that provide voice services.

General comment

2. ISPA's members accept that the introduction of zero-rated short codes for access to provincial government services is consistent with the ongoing implementation of the Numbering Plan Regulations.
3. The Authority has not, however, provided information on the demand from provincial governments for zero-rated short codes and ISPA is unable to locate any relevant expressions of intent from provincial government services¹ to launch such services.
4. This is important because implementation of the mandated short codes comes at a cost to licensees, which should be balanced against a realisable benefit.
5. The submissions below relate to how licensees are meant to implement such a notice based on the information provided and to related systemic issues with the management of numbering resources by the Authority.

Allocation status, assignee, and terminating licensee for each code

6. Each of the nine short codes must resolve to a single identified destination. The draft notice does not identify for any short code:
 - 6.1. The IECS licensee that will terminate the short code; or
 - 6.2. The underlying receiving number to which the short code must route; or
 - 6.3. Whether the short code has been allocated in the ten years since the batch of short codes were reserved.

¹ The Gauteng Provincial Government provides a USSD code that enables Gauteng citizens to lodge service delivery issues and complaints at no charge.

7. ISPA members request that the following information be included in the final notice in respect of each of the nine short codes, to place licensees in a position to implement the mandate:
 - 7.1. Whether the code has been allocated and, if so, the date of allocation;
 - 7.2. The provincial department or entity that is the assignee;
 - 7.3. The individual licensee appointed to terminate the code; and
 - 7.4. Confirmation that the terminating licensee has accepted the assignment and is ready to receive traffic.

A single consolidated implementation specification

8. It is not feasible for SMME voice providers to negotiate technical arrangements separately with nine provinces and multiple incumbent networks.
9. ISPA's members accordingly request that the Authority publish, not less than 90 business days before the commencement of the routing obligation, a consolidated implementation specification setting out, for each code:
 - 9.1. The underlying receiving number or numbers to which the code must route;
 - 9.2. The terminating licensee and the points of interconnection at which the route may be handed off, including for indirectly interconnected originating licensees; and,
 - 9.3. The change control procedure applicable to any subsequent alteration of the destination / terminating licensee.

Scope of the obligation

10. Paragraph 4 of the draft notice refers to "communications" while paragraph 5 refers to "calls".
11. The Authority is requested to clarify in the final notice whether the obligation applies to voice calls only, or also to SMS messages and/or USSD.
12. Further, members request clarity on how they should treat:
 - 12.1. Calls originated by inbound international roamers on South African networks, and
 - 12.2. International calls to the short codes.

Zero-rating and wholesale cost recovery

13. As the Authority is aware, zero-rating retail access does not eliminate the wholesale cost of origination, transit and termination. There is no information in the notice on how these costs are to be allocated.
14. In the absence of a rule the wholesale position is that rates are subject to "bilateral negotiation". This means in practise that the incumbent dictates a rate to the market and the cost burden falls on SMME and non-incumbent licensees:
 - 14.1. An SMME provider that has no direct interconnection with the terminating licensee will originate the call free of charge and pay an incumbent for transit.

- 14.2. Where the terminating licensee is itself an incumbent, it recovers its costs through its agreement with the provincial government, while smaller competitors absorb their costs themselves.
- 14.3. Where an SMME licensee seeks to dispute the rate dictated by the terminating licensee, it's only option is to approach the ICASA Complaints and Compliance Committee (CCC). This is not a realistic option for small providers, particularly given the low likely volume of calls to the provincial government short codes.
- 15. This directly conflicts with the stated purpose of the Numbering Plan Regulations to ensure that "numbering allocations are fair and non-discriminatory"².
- 16. ISPA submits that the Authority should utilise Schedule 2 to the Numbering Plan Regulations (the toll-free framework) and provide in the final notice that:
 - 16.1. The assignee or its appointed terminating licensee bears the cost of origination and transit;
 - 16.2. Such arrangements must be fair and non-discriminatory as between direct and indirect interconnection; and
 - 16.3. A default origination and transit rate or determination mechanism applies where no agreement is concluded within 30 days of the publication of the implementation specification, so that a small licensee is not required to litigate in order to comply.

The continuing lack of an accessible central numbering database

- 17. A number of ISPA members highlighted the ongoing lack of a proper technical framework and/or central database which is accessible to licensees, and which confirms to which licensee numbering resources have been allocated.
- 18. They note licensees still don't have an authoritative source of number allocations, let alone one that enables dynamic updates of routing to bring numbers into service in an effective and timely manner.
- 19. The existence of such a database would remove many of ISPA's objections to the draft notice.

Effective date of the notice

- 20. ISPA's understanding is that the implementation date will be set 180 business days after the publication of a final notice mandating service codes designated for provincial government services in the Government Gazette.
- 21. Should it be ICASA's intention that implementation will be 180 business days after publication of the draft notice (i.e. 31 August 2026) ISPA submits that this would be incorrect and inconsistent with the Authority's prior approach. Licensees must be given a definite and sufficient period for implementation.

² Regulation 2(d)

Conclusion

22. ISPA wishes to emphasise that licensees are being placed in an untenable position by the terms of the draft notice, There are significant penalties for non-compliance by the deadline while licensees may not be able to comply (e.g. because a provincial government has not appointed a terminating licensee) and have not been provided with the information required to comply.
23. Should the Authority elect to hold public hearings ISPA records its interest in participating.

Regards



pp ISPA Chairperson