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The Executive Vice Chairman
Nigerian Communications Commission
Plot 423, Aguiyi Ironsi Street, Maitama, Abuja
(Attention: Director, Legal and Regulatory Services)

Dear Sir,

Re: Comments on NCC Draft Consultation Document for Deployment of Fifth Generation (5G) Mobile Technology in Nigeria Submitted by Internet Society, Nigeria Chapter

Sequel to the public call by the Nigerian Communications Commission to submit comments on the Draft Consultation Document for the Deployment of Fifth Generation Mobile Technology in Nigeria, the Internet Society, a non-profit organization as a stakeholder in the Internet Ecosystem hereby submits the following comments.

It is believed that the comments will add positive value(s) to the document.

Thank you.

Caleb Ogundele

For ISOC Nigeria Chapter



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INTRODUCTION

5G will provide super-high data rates, better quality of service and very low latency through dense base station deployments. As a result, we will likely depend on 5G far more than we ever did with previous communications systems. Factories, businesses and critical infrastructure irrespective of locations, will all rely on 5G data connectivity and this technology will transform business models and network infrastructures. Community networks and communications would also be enabled enhanced through the deployment of 5G and the Internet speed will be greatly impacted positively. It is expected that 5G should bring the internet closer and faster to everyone.

Based on the review of the document, the following comments are hereby made:

Under section 4: the Spectrum/Bandwidth requirement for 5G Deployment

The required spectrum shall be such that allow internet to be accessible by all and it shall make connectivity to the Internet be seamless regardless of whichever location and socio-economic class the internet user belongs to.

All electromagnetic frequency spectrum identified in Section 6 for First Phase of 5G Deployment in Nigeria and Section 7 for second phase deployment shall be deployed in such a way as to facilitate internet access and connectivity to everyone in order to make the Internet accessible and available to everyone for such purposes as education, business opportunities, communications, entertainment, health applications etc.

Other comments or concerns you have on 5G deployment in Nigeria, and make constructive suggestions. Please include justification for any suggestions submitted.

Demand for 5G and broadband in rural areas before the pandemic

5G rural broadband and the elimination of the digital divide is not a new phenomenon. Bridging the digital divide is needed not only to allow internet access at broadband speeds for rural consumers, but also to aid the creation of a clever countryside – the rural sibling to smart cities. Up until recently, we described rural broadband as centered on a few cornerstones which are:

- a. Satisfying consumers' internet access needs - in lockstep with the technology evolution into fiber and 5G.
- b. Serving local businesses - in areas such as manufacturing, outdoor recreation, green energy production, and farming.



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- c. Enabling anchor institutions to work well - education, healthcare, and first responders.
- d. Competing service offerings - provided by national or local fixed and mobile broadband service providers.
- e. Providing access to growing parts of the overall economy - many rural areas missed out on the digital economy growth that came after the previous market crisis in 2008.

Rural network coverage has strong ties to these five objectives and purposes. Beyond the coverage-related challenges, rural communities face penetration-related challenges.

Closing or reducing the digital divide requires both coverage and penetration-related initiatives – especially in a world where demand has changed because of the pandemic. This is true in the Nigerian context just like every other climes where the pandemic has been and is still being experienced because people living in the rural areas want to be connected and they also want broadband services which can easily be facilitated by 5G because of the promises in terms of speed which facilitates broadband enabled services.



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The five objectives above are still valid, but the pandemic is changing society's priorities on three fronts: remote education, remote working and remote healthcare which are also needed in the rural areas hence the need for 5G in rural areas.

Recommendation

Based on the foregoing, the Internet Society hereby recommends that the technologies and strategies to be adopted for the deployment of 5G in Nigeria should be (a technology) or technologies that will also bring about the digital gains to the rural areas in order to access the above services.

Justification: All subscribers should have access to the same quality service irrespective of location whether urban or rural areas