

**Stakeholders' Consultation on the Draft New USF Strategic Plan, USF Principles & Guidelines, and the USF Operating Manual for the period 2022-2026**

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TO:

The Director-General  
Communications Authority of Kenya  
CA Center, Waiyaki Way  
P.O. Box 14448  
Nairobi-00800  
Email: [usfconsultation@ca.go.ke](mailto:usfconsultation@ca.go.ke)

CC:

Kenya ICT Action Network (KICTANet)  
Josephine Miliza <[josephine.miliza@kictanet.or.ke](mailto:josephine.miliza@kictanet.or.ke)>  
Barrack Otieno <[barrack@kictanet.or.ke](mailto:barrack@kictanet.or.ke)>  
Mwendwa Kivuva <[kivuva@kictanet.or.ke](mailto:kivuva@kictanet.or.ke)>

Association for Progressive Communications (APC)  
Carlos Rey-Moreno <[carlos@apc.org](mailto:carlos@apc.org)>

AHERINet Community Network  
Robert Owino Odera <[owinor@aheri.org](mailto:owinor@aheri.org)>

TunapandaNET Community Network  
John Gitonga <[gitonga@tunapanda.org](mailto:gitonga@tunapanda.org)>

Arid Lands Information Network (ALIN)  
James Nguo <[jnguo@alin.net](mailto:jnguo@alin.net)>

Athi Community Network  
Paul Kilongi <[pkilongi@gmail.com](mailto:pkilongi@gmail.com)>

Dunia Moja Network  
Twahir Hussein Kassim <[twahir.hussein@duniamoja.network](mailto:twahir.hussein@duniamoja.network)>

Lanet Umoja Community Network  
Mary Njuguna <[njugunamary777@gmail.com](mailto:njugunamary777@gmail.com)>

Irene Misoï <[irenemisoi@gmail.com](mailto:irenemisoi@gmail.com)>

**Re: Public Consultation on Draft New USF Strategic Plan, USF Principles & Guidelines, and the USF Operating Manual for the period 2022-2026**

Thank you for the opportunity to provide commentary on the draft new USF strategic plan, USF principles & guidelines, and the USF operating manual for the period 2022-2026.

**General Remarks**

The COVID-19 pandemic reinforced the critical role meaningful reliable and affordable access to broadband plays in our everyday lives. It contributed to a connectivity boost, moving from basic connectivity to more bandwidth-intensive technologies. However, it also exposed the long-standing existing digital inequalities which continue to be further amplified as it increases the social and economic gaps between the connected and unconnected.

In the COVID-19 era, community networks are playing an increasingly important role in meeting the rising demand for affordable connectivity. In Africa, community networks are usually more than telecommunications infrastructure providers; they exist in support of economic and social activities, often aiming to minimise the outflow of economic value leaving the community to pay for connectivity services. Beyond access, they also create a platform that promotes building local capacities, as well as the creation and distribution of locally relevant content. Community networks, by design, go beyond simple access to deliver universal and meaningful connectivity<sup>1</sup>.

In Kenya, where the community networks are growing in size and number, there was positive regulatory change in 2021 with the introduction of the Community Networks Service Provider (CNSP) license in the Communications Authority Unified Licensing Framework<sup>2</sup>.

We commend CA for aligning the USF strategy to recommendations from both the 2021 Access Gap report as well as the Licensing and Spectrum Sharing Framework for Community Networks<sup>3</sup> and recognizing that *“The community networks will offer opportunities for capacity building, besides providing centers to serve special interest groups like PWDs, Women, and the*

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<sup>1</sup> Moreno, Carlos Rey, [Understanding Community Networks in Africa](#) Internet Society, 2017

<sup>2</sup> <https://www.ca.go.ke/industry/telecommunication/market-structure/>

<sup>3</sup>

<https://www.ca.go.ke/wp-content/uploads/2021/05/Licensing-and-Shared-Spectrum-Framework-for-Community-Networks-May-2021.docx.pdf>

*Youth. CA, through the support of the USF, needs to further embrace technologies on a micro-scale and small scale solutions in closing the access gaps”.*

In particular, we welcome the move by USF to fund the establishment of 100 Community Networks in the next five years. In order to ensure the success of those Community Networks who successfully apply for and receive a grant under this dispensation, we encourage CA to adopt a holistic approach to supporting them that should take into consideration capacity building and capacity development. With that in mind, we propose the following:

### **Specific Recommendations**

#### **Page 44 (Section 4.2.1.1) on Infrastructure and Services projects regarding funding the establishment of 100 Community Networks**

The draft strategy states *“It is proposed that this be done by advertising the issuance of grants to interested licensees who meet the set requirements or community-based actors with the potential to meet the requirements .”* The minimum criteria for qualifying organisations have not been defined. We recommend including minimum criteria that are aligned to the Community Networks Service Provider (CNSP) licensee requirements. The eligibility criteria for CNSP licensees include organisations that are community-owned; these are Community-Based organizations (CBOs), a Society or Non-Governmental organizations (NGOs).

#### **Page 50 (ANNEX: 1 Key Result Areas, Strategic Objectives, Key Performance Indicators, Baselines and Targets) ICT Infrastructure and Services rolled out in telecommunications infrastructure voice and connectivity services, Broadcasting, and Postal services in unserved and underserved communities**

We fully support the below strategic objectives which will support the provision of broadband connectivity to citizens, especially vulnerable groups in unserved and underserved communities.

- *Key result area 1 - Telecommunications (Voice and Data), strategic objective 1.5 which is to facilitate the establishment of a 100 community Network in the unserved and the underserved communities*
- *Key result area 5 - Infrastructure and Services - e-Inclusivity, strategic objective 5.1 which proposes the enhancement of access to services including Voice and Data among the persons with disabilities, women and other vulnerable groups in unserved and underserved communities*

#### **Page 51 (ANNEX 1: Digital Skills and Content: Developed local content and applications to encourage and promote usage of ICT services and products**

We support key result areas 6,7,8,9 and 10 as they address issues around availability, affordability and adoption of broadband, thus taking a holistic approach to digital inclusion. However, on key result area 7 on capacity building, we recommend that beyond strategic objective 7.1, capacity building programs for organisations establishing and operating community networks should also be included as a strategic objective. This will support the

building of technical and managerial capacity and skills of women and men on how to plan, build, operate and manage their own telecommunication networks and local content according to their own needs.

The published licensing and shared spectrum for community networks<sup>4</sup> states that the “Authority intends to build partnerships with organisations” such as “education institutions, civil society agencies and community network alliances”. In order to maximise the chances of success for community networks grantees under the USF strategy, we encourage CA to consider a broader set of stakeholders that could apply for funding for these projects.

As an example, the Association for Progressive Communications (APC)<sup>5</sup> is supporting Tunapanda Kibera CBO which champions TunapandaNet Community Network in training and mentoring seven organisations piloting or aiming to establish community networks, these are: Dunia Moja in Mtondia, Kilifi County, Athi community network in Meru County, Lanet Umoja in Nakuru County, Oasis Mathare in Mathare, Nairobi County, Action Pour’ Le Progres in Kakuma Refugee Camp in Turkana County, Ng’arua Maarifa Center in Laikipia County and Africa Higher Education Research Institute Community Network (AHERINET) in Kisumu, Homa Bay and Siaya County. The program is supported by an advisory committee and experts from organisations such as Kenya Community Media Network (K-COMMNET), Internet Society, Kenya ICT Network(KICTANET), Arid Lands Information Network (ALIN).

The first phase of the training and mentoring culminated in the first Kenya National School of Community Networks which was hosted by AheriNET in Kisumu early this year<sup>6</sup>. This work directly contributes to the sustainability of the supported organisations. Details of TunapandaNet’s work includes:

- Selecting the seven local organisations in each based on robust digital inclusion criteria;
- Assessing the training needs of the local organisations and designing and delivering training workshops and a mentorship program that addresses their capacity gaps;
- Developing an initial cost analysis for the infrastructure that each local organisation requires, and facilitating resource mobilisation (i.e. identifying potential funders); and,
- Convening and facilitating online and offline (or in-person) interactions to strengthen the relationships among the local practitioners in Kenya.

This will create mechanisms that promote peer to peer learning opportunities to facilitate knowledge exchange among community networks in Kenya.

The model developed by Tunapandanet could be turned into an ongoing program supported by the USF. Among the eligible costs for such a mentorship initiative, the following should be considered:

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<https://www.ca.go.ke/document/licensing-and-shared-spectrum-framework-for-community-networks-may-2021/>

<sup>5</sup> With support from the UK Foreign, Commonwealth and Development Office (FCDO) Digital Access Program

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<https://www.kictanet.or.ke/kenya-school-of-community-networks/#:~:text=The%20Kenya%20National%20School%20of,Rhizomatica%20with%20support%20from%20KICTANet.>

- Personnel costs to coordinate and implement the training and mentoring program.
- Stipends, including communication and equipment allowances, for the mentees.
- Travel, accommodation, and related expenses for the physical gatherings required in the program.
- Consulting fees for professionals conducting the cost analysis.
- Equipment
- Training toolkit.

#### **Page 46 (4.3. Strategic Plan Budget)**

A detailed budget per year for the 5 year period has been outlined for each of the Strategies in the USF Strategy. In the text leading to the table with that detail, more information is given as to the amount allocated to each of the Key Result Areas (KRA) within each of them. In that regard, 6.19b Kshs are allocated for the 5 years in the KRA on “Telecommunication (Voice & Data)” from the 20.204b Kshs assigned to the Strategy on “Infrastructure and Service”. Further detail about how that allocation is broken down for each Strategic Objective is said to be included in Annex 2. However, that annex was not part of the public consultation documents. In that regard, it is difficult to comment whether sufficient funds have been allocated to successfully achieve the Specific Objective to fund the creation of 100 Community Networks. Data gathered by APC from the community networks it supports around the world suggest that this will require 750m kshs

In the same budget section of the USF Strategy, 147m are allocated to the KRA on Capacity Building. As pointed out above, this doesn’t seem to include specific training for communities to install and operate their networks. The program described above and run by Tunapanda costs 15m Kshs to train 7 communities. If training is to be provided to 100 communities receiving the fund, an additional 214M would be required. Hence, we recommend the funding would this KRA be increased with that amount.

#### **Summary**

We applaud the decision to include and provide support for the development of community networks within the USF strategy. We also commend the broad-based consultations that resulted in the USF Strategy in line with the constitutional requirements for public participation. In order to maximise their chances for success and their potential impact, we encourage CA to adopt a holistic approach to their support which includes the necessary capacity-building to develop the technical, organisational, and community-building skills needed to grow healthy and vibrant community networks that will deliver meaningful connectivity where it is needed most.