

28 December 2025

Mrs. Emilia Nghikembua
Chief Executive Officer
Communications Regulatory Authority of Namibia
56 Robert Mugabe Avenue
Windhoek, Namibia

Subject: Response to CRAN Notice of Comments on Starlink Namibia Internet Services' Class Comprehensive Telecommunications Service License Application and Spectrum License Application

Dear Chief Executive Officer Mrs. Emilia Nghikembua,

Thank you for your letter dated 15 December 2025, where the Communications Regulatory Authority of Namibia (CRAN) informed Starlink of the written comments received following the publication of its Internet Services Class Comprehensive Telecommunications Service License Application and Spectrum License Application.

The overwhelming public support for Starlink's application clearly demonstrates Namibians' urgent demand for innovative, high-speed internet to bridge the digital divide, empower rural communities, and fuel economic growth. With over 98% of public comments in support of Starlink's application, there is clear public interest from a broad section of Namibians for CRAN to rapidly approve the application, enabling Starlink to deliver immediate, life changing benefits in alignment with Namibia's digital transformation priorities.

While the sheer number of comments in support of Starlink is exceptional, it is important to underscore that each of these comments represents Namibian individuals, businesspeople, school children, and others who stand to benefit from access to enhanced connectivity options with Starlink. This means commercial farm operators like Kupferberg Farming in Otavi, tourism operators like Pangolin Voyager in Ngweze, mining service companies like Flightec in Swakopmund, the Otjimuhaka primary school in the Kunene region, and the Epembe combined school in the Ohangwena region.

Below, we address the primary concerns raised, illustrating with evidence how Starlink's entry would strengthen Namibia's ICT sector, sovereignty, and development goals. Of course, it is important to underscore that fewer than 2% of comments opposed Starlink's application, a testament to the broad consensus support for Starlink in Namibia.

1. Regulatory Compliance & Market Fairness:

Starlink has taken the purposeful decision to establish a local entity in Namibia and apply for licenses so that it will be held to the same regulatory, legal, and tax standards as the incumbent operators. We do this to ensure fair competition amongst the various operators, to ensure we have a direct and close relationship with the relevant regulatory authorities so that we can respond to issues quickly, and to ensure that customers end up benefitting the most by offering them multiple options for connectivity.

While we recognize this is historically not the licensing approach taken by satellite operators, Starlink has more than 5 years of history operating in regulatory compliance across 156 markets using this model. In these 156 markets spanning all 7 continents, we are meeting requirements for lawful interception, consumer protection, quality of service standards, and more while also paying local taxes and regulatory fees like other local operators.

Expanding on the topic of market development, allowing Starlink to enter the Namibian market will benefit existing operators – including MTC and Telecom Namibia - by spurring innovation and improving overall service quality. Increased competition typically drives operators to enhance their offerings and reduce prices, which ultimately benefits consumers and the broader ecosystem. In the absence of

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competition, there is no incentive for existing operators to invest in infrastructure to drive down cost and reach the very communities that Starlink is designed to serve.

But rather than being direct competition for fiber-based incumbents, Starlink complements existing operators, as it is ideally suited for rural areas where costs are typically prohibitive for incumbents. Starlink provides high-speed internet access in rural and underserved areas where traditional operators have been unable to deploy infrastructure in a cost-effective manner. As a result, Starlink plays a key role in bridging the digital divide by providing increased access to meaningful and affordable connectivity.

The Starlink team experienced the digital divide in Namibia firsthand during a community meeting to discuss connectivity challenges Oikango Village in the Ongwediva constituency in June 2024. Existing operators have been unable to deploy suitable infrastructure to Oikango Village due to the rural setting and low population density, despite multiple calls from village leaders for investment in connectivity infrastructure. Starlink could play an important, complementary role to ensure rural communities across Namibia are not left behind.



Photo from Starlink visit to community meeting in Oikango Village in the Ongwediva constituency in June 2024.

2. Economic Impact & Local Industry Development:

Fundamentally, increased broadband access leads to direct economic development. Among many other studies, the World Bank concluded that every 10% increase in broadband penetration leads to nearly 1.5% in GDP growth.¹ Starlink's role in Namibia will be to bring broadband access to rural communities that currently cannot access the digital economy. We will help provide high-quality connectivity in the most underserved regions, which will enable rural businesses to grow just as if they were in the city. This enhancement of commercial activity across Namibia will have far reaching consequences, such as increasing rural wealth but also growing tax revenue and attracting foreign investment.

Starlink's entry into the market will also enable economic opportunities for existing players. In addition to direct-to-consumer offerings, Starlink has committed to establishing commercial partnerships with

¹ See <https://scorecard.worldbank.org/en/outcomes/digital-connectivity/results-narrative>.

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resellers and retailers in Namibia. To demonstrate the seriousness of this commitment, Starlink has held commercial partnership discussions with multiple incumbents in Namibia, including MTC, Telecom Namibia, and Paratus. Finalizing these commercial agreements would benefit both parties. The incumbents would be able to offer their customers more connectivity options and Starlink would gain access to local market knowledge and an established customer base. We are keen to formalize these commercial partnerships upon the successful conclusion of licensing with CRAN.

Most importantly, rather than undermining local operators or delaying fiber and 5G deployments, Starlink accelerates nationwide connectivity by bringing fiber-like connectivity to remote areas where it can provide backhaul services to the existing operators. This replaces the need to deploy terrestrial infrastructure that is prohibitively expensive or logistically impractical and opens new customer bases for mobile services. In this way, Starlink complements existing investments and supports local sector growth for the incumbents where Starlink isn't a direct competitor. For example, in Nigeria, Starlink's market entry and subsequent provision of backhaul services to AMN resulted in reduced operating costs and a 25% increase in data consumption by customers. Without Starlink, this increased profitability for AMN would not have been possible.

The aforementioned economic impact and local industry development is possible because of Starlink's globally consistent business model that combines a direct route to the market with collaboration with local operators. While it is important for us to adapt to local market demands and conditions by way of local partnerships, it is equally imperative that we treat every country the same in terms of our approach to licensing and ownership. Being directly licensed with 100% ownership allows us to preserve the flexibility to move quickly and in the best interests of our customers without being beholden to the interests of other entities. 100% ownership also allows us to pass along the maximum amount of cost reductions to customers without being forced to add additional layers of margin to pay out shareholders. This is important because our customers predominantly reside in rural areas where purchasing power is low. In each of the 156 markets where Starlink operates, Starlink fully owns the entity holding the licenses.

To facilitate this business model, on 31 May 2024, Starlink Internet Services Namibia (Pty) submitted our Telecommunications Service License application for review with CRAN. For Starlink to obtain licensing from CRAN, Starlink requires an exemption from the 51% Namibian ownership requirement in the Communications Act (No. 8 of 2009). Starlink submitted a request to the Minister of Information, Communication and Technology for an exemption from the 51% Namibian ownership requirement as per the Communications Act (No. 8 of 2009), as we understand that exemptions are allowable and subject to the discretion of the Minister.

3. National Security & Data Sovereignty:

Starlink is an industry leader for cyber security and privacy. Our network is designed to ensure that our system is secure and that user data remains protected. Personal data collected and processed by Starlink is subject to, and Starlink complies with, all applicable data protection laws in Namibia. Starlink prioritizes security with state-of-the-art encryption and collaborates proactively with governments to meet cybersecurity and data protection standards, as demonstrated in our operations globally and across Africa. Contrary to the idea that Starlink will weaken Namibia's sovereignty, Starlink's resilient satellite network reduces vulnerability to ground-based disruptions, providing independent, secure connectivity that bolsters Namibia's digital resilience and complements connectivity during times of crisis, natural disaster, and submarine cable cuts.

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4. Universal Access & Affordability:

Starlink is uniquely positioned to rapidly advance broadband penetration in Namibia by delivering reliable, high-speed internet to underserved and remote regions at competitive prices. Starlink's pricing strategy aims to address the digital divide by making connectivity more affordable in rural and underserved areas where traditional infrastructure is costly and impractical. This is not about undermining existing services but about filling a crucial gap. By focusing on areas that are typically less profitable, Starlink enables local operators to concentrate on strengthening its urban and high-value market segments. This collaboration can lead to new revenue opportunities and partnerships that leverage Starlink's network for expanded service offerings. Additionally, Starlink stands ready to contribute meaningfully to the Universal Service and Access Fund, mirroring commitments in other markets, and making broadband truly accessible for education, healthcare, and entrepreneurship across the country.

5. Local Presence, Accountability & Investment:

Starlink has invested billions of dollars into its constellation and technology to provide connectivity instantly to the entirety of Namibia. There is not a phased rollout plan - once Starlink is licensed to operate, service will be available to any location in Namibia. Starlink has already established a local entity in Namibia - Starlink Internet Services Namibia (Pty) Limited - and is committed to establishing reseller partnerships to further spur local economic growth and facilitate consumer support. Starlink enables rapid, nationwide deployment while fostering long-term local jobs, skills transfer, and local value creation.

Granting Starlink's license will be a welcomed step toward empowering every Namibian with world-class connectivity, stimulating competition, creating jobs, and securing digital sovereignty. The resounding public mandate underscores this as a historic opportunity for progress. I strongly urge CRAN to approve the application swiftly, unlocking Namibia's full digital potential.

Sincerely,



Ben MacWilliams
Director, Starlink Market Access
Space Exploration Technologies Corp.