



**SOS: Support Public Broadcasting Coalition**

Suite 1, Art Centre, 22 4<sup>th</sup> Ave, Cnr 4<sup>th</sup> Ave & 6<sup>th</sup> Street,  
Parkhurst, 2193, Johannesburg

Phone +27 11 788 1278  
+27 76 084 8077; +27 74 690 1023

Email [info@soscoalition.org.za](mailto:info@soscoalition.org.za)

Website [www.soscoalition.org.za](http://www.soscoalition.org.za)

Attention: Hon. Yunus Carrim

Minister of Communications

**28 January 2014**

Dear Minister,

**RE: National Integrated ICT Policy Green Paper**

We write to you following your launch of the National Integrated ICT Policy Green Paper in Government Gazette 37261 on 24 February 2014.

The SOS Coalition is pleased that the Green Paper has finally been launched and that the opportunity has been opened up for the people of South Africa to engage purposively in a policy-making process which is set to impact on their lives profoundly.

We note, especially, the point made by the Honourable Deputy Minister in her foreword, that the issues raised in the Green Paper cannot be addressed by government alone, but

*need the active participation of business, trade unions, civil society organisations, individual experts and the public generally...[to] contribute to shaping a new integrated ICT policy relevant to our country's needs.*

We raise as a point of concern, therefore, the period accorded to the public to engage with the Green Paper, a 104 page document of a technical nature. It is our view that the 28 days given to the public is wholly insufficient for the people of South Africa to adequately access, engage and comment on the Green Paper. It is our view that a period of 60 – 90 days would better enable meaningful public participation in this process.

**Noting that:** ICTs and, consequently, this ICT Policy Review process are only tools to finding technological solutions to what are inherently social issues;

the people of South Africa will be the most affected by whatever emerges out of this policy review process;

**Further noting that:** the South African Constitution creates a requirement that government engage with citizens when making decisions that affect their lives;

policy making processes such as these are typically out of the reach of ordinary people because of, *inter alia*:

- i) The real lack of access to policy documents which are typically only available through the government gazette and the departmental websites which the vast majority of the people of South Africa have no way of accessing;
- ii) The failure of government to publicise these processes beyond those resourced sectors of our society;
- iii) The technical and highly bureaucratised nature of these policy-making processes; and

Not all sectors of society, particularly those ordinary people of South Africa who stand to be most affected by whatever emerges out of this review process, are equally equipped to engage the content of these policy documents or participate in the process, although they have substantively much to contribute;

The SOS Coalition urges you to:

- i) Strengthen your efforts in encouraging greater public participation, particularly from the ordinary people of South Africa, in the ICT Policy Review;
  - a. To this end, we also invite you to support our public participation drive in the [MyDigitalSA](#) campaign as part of an extensive campaign by the Department of Communications to raise awareness about, encourage participation in and inform the people of South Africa of the importance of the ICT Policy Review;
- ii) Extend the submission deadline beyond the mere 28 days given in terms of the Government Gazette to between 60 and 90 days in order to afford the ordinary people of South Africa the opportunity to meaningfully engage with, and develop their written responses to the Green Paper;
- iii) Ensure that the public hearings on the Green and White Papers, respectively, extend beyond the urban centres of South Africa; and
- iv) Allocate sufficient resources to ensure that the greatest possible number of people from all parts of South Africa are able to attend and participate in the public hearings for both the Green and White Papers.

It is our view that, without these key interventions on your part, the principles of full participation and fair process which are so central to our constitutional democracy will only be frustrated.

In order for us, all of the people of South Africa, to respond to your call to take part and help shape ours and our country's future, we must be enabled to do so.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Sekoetlane', with a long horizontal line extending to the right.

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Sekoetlane Jacob Phamodi

Coordinator (Acting)

The SOS Coalition represents a broad spectrum of civil society stakeholders committed to the broadcasting of quality, diverse, citizen-orientated public-interest programming aligned to the goals of the SA Constitution. The Coalition includes a number of trade union federations including COSATU and FEDUSA, a number of independent unions including BEMAWU and MWASA; independent film and TV production sector organisations including the South African Screen Federation (SASFED); a host of NGOs and CBOs including the Freedom of Expression Institute (FXI) and Media Monitoring Africa (MMA), and a number of academics and freedom of expression activists.