



26 May 2006

Ms Fatima Chohan-Khota
The Chairperson
Portfolio Committee on Justice and Constitutional Development
PO Box 15
Cape Town 8000
South Africa

Attention: The Secretary to Parliament, Ms P Sibisi
Email: psibisi@parliament.gov.za

Dear Chairperson

VODAFONE COMMENTS ON THE REGULATION OF INTERCEPTION AND PROVISION OF COMMUNICATIONS-RELATED INFORMATION ACT AMENDMENT BILL [9-2006]

Vodafone Group Plc ("Vodafone") thanks the Portfolio Committee on Justice and Constitutional Development for the opportunity to provide comments on the Regulation of Interception and Provision of Communications-related Information Act Amendment Bill (the "Bill").

Vodafone is a founding shareholder of and currently holds a 50% equity interest in Vodacom Group (Pty) Ltd. Vodafone is the world's leading mobile telecommunications company, with equity interests in mobile operators in 27 countries with 179 million proportionate customers worldwide as at 31 December 2005, as well as partner networks (non-equity investments) in a further 33 countries.

Vodafone wholly endorses Vodacom's written submission and shares Vodacom's commitment to ensuring that South Africa is a safer place for all citizens and visitors. Vodafone wishes to submit the following additional comments, which are informed both by being a long-term investor in South Africa and its experience acquired from operating under many different legal and regulatory regimes around the world.

- (1) The effectiveness of prepay registration to meet the objectives must be realistically assessed.
- (2) Costs of any prepay registration system needs to be carefully analysed and assessed against the potential benefits.
- (3) Any prepay registration system need to be practical and reliable, taking account of national characteristics and circumstances (e.g. distribution channels for mobile services, availability to verification).
- (4) The broader impacts of the introduction of a prepaid registration system on the telecoms sector and consumer behaviour must be explicitly considered.

Vodafone Group Services Limited

Bell House, The Connection, Newbury, Berkshire RG14 2FN
Tel: +44 (0)1635 33521 Fax: +44 (0) 1635 686698 www.vodafone.co.uk
Registered Office: Vodafone House, The Connection, Newbury, Berkshire RG14 2FN. Registered in England No. 3802001

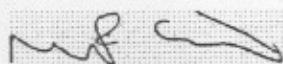
DL: +44 (0)1635 674524
Fax: +44 (0)1635 686698
e-mail : neil.gough@vodafone.com

Vodafone requests the opportunity to make an oral presentation to explain these points in more detail at the hearing scheduled on 30 May 2006.

Due to the logistics of travelling from the UK, Vodafone would request that the Chairperson kindly schedules Vodafone's presentation in the afternoon session. I would expect our presentation to last no longer than 20 minutes.

I look forward to receiving confirmation of the public hearing process.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Neil Gough', is written over a rectangular area with a fine grid pattern.

Neil Gough
Director, Group Public Policy International