NATIONAL BROADBAND STRATEGY 2025-2030

COMMENTS TEMPLATE

Submit to: nbs@ca.go.ke

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REPRESENTATIONS

No.	Section/ Subsection	Current text	Comments	Proposed text	Justification
4.	STRATEGIC MODEL 4.1.1. Strategic Objective 1 Initiative 5 Spectrum and Infrastructure Management	5) c) Avail additional spectrum to operators to meet their 4G and 5G requirements, focusing on IMT bands agreed in WRC-23 (C band, U6 Ghz band).	Removing the reference to upper 6 GHz for IMT is essential to keep flexibility for WAS/RLANs, ensuring optimal spectrum use and long-term broadband performance.	5) c) Avail additional spectrum to operators to meet their 4G and 5G requirements, focusing on national needs	Please see the comments below

Signed:

Signature : Martha SUAREZ

Date : Monday, 18th May 2026

May 18, 2026

The Director General/CEO
Communications Authority of Kenya
CA Centre, Waiyaki Way, Westlands
P.O. Box 14448
Nairobi 00800
nbs@ca.go.ke

Re: DSA Comments on the Kenya National Broadband Strategy 2025–2030

Dear Mr David Mugonyi,

The Dynamic Spectrum Alliance (DSA) respectfully submits the following comments in response to the Communications Authority of Kenya (CA) consultation on the "*Kenya National Broadband Strategy 2025–2030*."

The Dynamic Spectrum Alliance (DSA) is a global, cross-industry, not-for-profit organization that advocates for laws, regulations, and economic best practices to enable more efficient utilization of spectrum, fostering innovation and affordable connectivity for all. Our membership spans multinationals, small-and medium-sized enterprises, as well as academic, research and other organizations from around the world all working to create innovative solutions that will benefit consumers and businesses alike by making spectrum abundant through dynamic spectrum sharing[1].

The Third National Broadband Strategy for Kenya (NBS) 2025–2030[2] has been published by the Ministry of Information, Communications and the Digital Economy (MoICDE), pursuant to its mandate under the Kenya Information and Communications Act (1998).
The Dynamic Spectrum Alliance (DSA) welcomes Kenya's National Broadband Strategy 2025–2030 and strongly supports the Government's objective of delivering affordable, high-

[1] A full list of DSA members is available on the DSA's website at www.dynamicspectrumalliance.org/members
[2] The National Broadband Strategy For Kenya 2025-2030 Public Consultation Paper is available at: https://www.ca.go.ke/sites/default/files/2026-05/NATIONAL%20BROADBAND%20STRATEGY_mon%20.pdf

capacity, inclusive, and future-ready broadband connectivity across the country. The Strategy appropriately recognizes broadband as foundational national infrastructure and highlights the importance of technology neutrality, infrastructure sharing, affordability, digital inclusion, and innovation.

As broadband traffic growth continues to accelerate, particularly indoors, DSA believes it is critical that Kenya maintains sufficient spectrum resources for licence-exempt technologies such as Wi-Fi, which today carry the vast majority of consumer and enterprise broadband traffic globally. In this context, DSA emphasizes that the upper 6 GHz band is uniquely suited to support next-generation Wi-Fi technologies, including Wi-Fi 6E and Wi-Fi 7, due to the need for wide, contiguous channels to deliver low latency, high throughput, and cost-effective broadband capacity for homes, enterprises, education, healthcare, and industrial applications.

DSA further notes that the upper 6 GHz band is not the optimal candidate spectrum band for wide-area IMT/mobile deployments given existing coexistence challenges, incumbent usage, and the availability of alternative spectrum ranges more naturally suited to macro mobile coverage objectives. By contrast, Wi-Fi technologies require large contiguous bandwidth blocks and depend heavily on access to upper 6 GHz spectrum to achieve their full performance potential.

The Communications Authority should consider expanding the range of frequencies available for licence-exempt use in the 5925-7125 MHz band. There are several reasons why the CA should pursue this approach:

(1) Allowing Wireless Internet Service Providers (WISPs) to deploy gigabit class networks. If all 1200 MHz in the 6 GHz band is made available under a licence-exempt framework, Wireless Internet Service Providers in Kenya could significantly increase capacity per customer or expand coverage to more residential users.
(2) More efficient use of the spectrum. WAS/RLAN can operate in the band while ensuring that existing incumbent services can continue to thrive in the band. Globally, the 6 GHz band is allocated to a range of services, including fixed satellite services, fixed services and mobile service with some applications, such as electronic news gathering. Permitting licence-exempt access for Wi-Fi and other technologies in the entire 6 GHz band will not only open the door to innovation by offering extra capacity but can be introduced while protecting and still allowing the incumbent services to grow.

Introduction of licence-exempt services will not necessitate a spectrum clearance process which would likely be complex and expensive. The licence-exempt devices will be able to share the band with the incumbents and this will significantly increase spectrum efficiency.

(3) As RLANs can work with any backhaul – mobile network, cable, fibre, fixed wireless access, satellite, having all 1200 MHz available will support competition across platforms and providers. There have been important public programs and initiatives to increase Wi-Fi hotspots to provide high-quality Internet access to citizens and visitors in public spaces. If we refer to remote areas, connectivity and cost-efficiency is best achieved by benefiting from scale inherent in globally adopted Wi-Fi standards, which mean lower cost of coverage for low-population density areas and lower cost of terminals.

(4) Immediately realizable benefits. Making the entire 5925-7125 MHz band licence-exempt will provide benefits for end users in Kenya immediately. Wi-Fi 6E and Wi-Fi 7 deployments could start as soon as the regulations are approved.

Accordingly, DSA encourages Kenya to consider making at least an additional contiguous 160 MHz available for licence-exempt WAS/RLAN use in the upper 6 GHz band to complement existing lower 6 GHz frameworks and support the growing broadband capacity demands of consumers and businesses. This would help ensure long-term spectrum certainty, support innovation, improve indoor connectivity performance, and reduce deployment costs through efficient fibre and Wi-Fi broadband architectures.

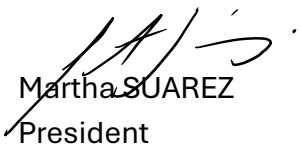
Should Kenya ultimately decide to designate portions of the upper 6 GHz band for IMT/mobile use, particularly above 6585 MHz, DSA encourages the adoption of modern spectrum sharing frameworks that would enable non-prioritised or opportunistic WAS/RLAN access where technically feasible. Database-assisted coordination mechanisms and dynamic spectrum access approaches can significantly improve overall spectrum efficiency while continuing to ensure appropriate protection of incumbent users and future services.

DSA also strongly supports the Strategy's emphasis on infrastructure sharing, open-access principles, streamlined wayleave processes, public Wi-Fi deployment, community connectivity solutions, and rural broadband expansion. Reducing unnecessary regulatory burdens and enabling flexible spectrum access models will be essential to achieving Kenya's ambitious broadband and digital transformation objectives.

Overall, DSA believes the National Broadband Strategy 2025–2030 provides a strong foundation for Kenya's continued leadership in Africa's digital development and looks forward to continued engagement with the Government and stakeholders on implementation of the Strategy.

In conclusion, DSA reiterates its commitment to supporting the Authority in the development and implementation of dynamic spectrum sharing policies and technologies. We remain available to discuss these comments and to provide any additional information the Authority may require.

Respectfully submitted,



Martha SUAREZ
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Dynamic Spectrum Alliance