NATIONAL COMMUNICATIONS AUTHORITY

CONSOLIDATED RESPONSE

to Written Queries from Prospective Applicants

Issued pursuant to Section 3.5 of the
Request for Applications for Spectrum Licences
in the 700 MHz, 2.3 GHz and 3 GHz Mid Bands
for the Provision of 5G Mobile Broadband Services

In respect of the Request for Applications, Version 1.0, dated 16 July 2026

ISSUED 31 JULY 2026

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Sixty written queries were received from four prospective Applicants. They are answered below as fifty-seven responses, grouped by theme; related queries are answered together. Two further matters, at Questions 2 and 3, are addressed by the Authority of its own motion.

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INTRODUCTION AND STATUS OF THIS DOCUMENT

This document constitutes the Authority's consolidated response to written queries received from prospective Applicants in respect of the Request for Applications for Spectrum Licences in the 700 MHz, 2.3 GHz and 3 GHz Mid Bands, Version 1.0 dated 16 July 2026 ("the RFA"), issued pursuant to item 4 of the timetable at Section 3.5 of the RFA.

It answers the sixty written queries received from four prospective Applicants between 22 and 28 July 2026 as fifty-seven numbered responses. Queries have been grouped by theme rather than answered in the order received. Related queries are answered together where doing so aids clarity, and cross-references between responses are given where a point is dealt with more fully elsewhere in this document. Queries are not attributed to the Applicant that raised them. The Authority further addresses, of its own motion, two matters arising from the pre-application briefing held on 27 July 2026 and from its own review of the published text: these are dealt with at Questions 2 and 3.

This consolidated response forms part of the RFA within the meaning of the definition of "RFA" in Section 1.4, and Applicants may rely on it accordingly. Where this document expressly amends, corrects or supplements the RFA, as identified under "Amendments and corrections to the RFA" below, the amendment or correction prevails over the published text on the point it addresses. Every other response explains or clarifies the RFA without modifying its terms.

All responses below are keyed to the numbering of the published RFA, Version 1.0 dated 16 July 2026. Where a query cites a section that does not exist in the published RFA, the response addresses the substance of the query against the published text.

Nothing in this document derogates from the Authority's powers under Section 3.6 of the RFA.

Standard position — representations on final licence terms

> *Wherever a query invites the Authority to amend or soften a term of the RFA, the following applies. Successful Applicants will, before the issue of licences, have the opportunity to make written representations to the Authority on the terms of the final licence. The Authority does not commit, by this Request for Applications or by any response to a clarification query, to amend any term. Where, however, a representation demonstrates a sound basis for better attaining the Authority's objectives under this RFA and its statutory mandate, the Authority may consider reflecting an adjustment to its stated intentions in the binding terms of the licence. Any adjustment made following such representations shall not alter the basis on which Applicants competed in this process, nor confer a material competitive advantage on an individual Successful Applicant. The terms of this RFA otherwise stand, and Applicants apply on that basis.*

Notice — adjustment of the timetable

The Authority gives notice, pursuant to Sections 3.5 and 3.6 of the RFA, that the timetable at Section 3.5 is amended in two respects. **First, the deadline for the submission of applications and each subsequent date in Table 7 are adjusted by twenty-one (21) calendar days, so that applications are to be submitted by 5:00 pm on Thursday, 27 August 2026.** Secondly, and separately from that adjustment, the period for the payment of the Licence Fee is extended from thirty (30) days to sixty (60) days from notification of award, so that Licence Fees fall due by Tuesday, 17 November 2026. The revised Table 7 is at Annex A to this document. This adjustment applies to all Applicants equally. The timetable adjustment does not, of itself, alter the coverage, rollout or capacity obligations in Section 2.9. Amendments, supplements and corrections to those obligations made separately by this document are identified under "Amendments and corrections to the RFA" below. The adjustment and its effect are dealt with more fully in the response to Question 8.

Amendments and corrections to the RFA

This document does two things. In most places it explains or applies the RFA as published. In the places listed below it formally amends, corrects or supplements the published text. Each response in this list modifies the RFA within the meaning of the definition of "RFA" in Section 1.4 and prevails over the published text on the point it addresses. Applicants should read those responses as binding changes to the RFA. No other response in this document modifies the published text.

> **Question 3 (Correction).** References in Sections 2.12 and 3.1A(6) and Annex 1 to the Ghana Investment Promotion Centre Act, 2013 (Act 865) and to the Centre are read as references to the Ghana Investment Promotion Authority Act, 2026 (Act 1173) and to the Ghana Investment Promotion Authority.
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> **Question 8 and Annex A (Amendment).** The timetable at Table 7 (Section 3.5) is adjusted by twenty-one (21) calendar days; the period for the payment of the Licence Fee is extended from thirty (30) days to sixty (60) days from notification of award; and the payment of the Licence Fee and the issue of the Licence, combined at item 12 of the published Table 7, are separated, the Licence to issue within ten (10) Business Days after confirmed receipt of the full Licence Fee. Dates stated elsewhere in the RFA by reference to the timetable, including in the invitation at the front of the RFA and in Section 3.3.1(1), are adjusted accordingly.
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> **Question 32 (Supplement).** Section 2.9.3 is supplemented so that the fixed compliance dates in that Section do not operate retrospectively against a Licensee that first becomes subject to the SMP coverage obligations after one or more of those dates has passed, the Authority specifying instead a reasonable prospective period for attainment. See also the response to Question 33.
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> **Question 37 (Amendment).** For the purposes of Section 2.10.2(1), the words "at principal cost" are to be read as "on a cost-oriented basis".
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> **Question 42 (Amendment).** The words "or per the regulated tariff in force" in Section 2.10.3 are given the restricted meaning stated in that response.
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> **Question 45 (Supplement).** Section 2.9 is supplemented by specifying SS-RSRP greater than -105 dBm as the signal-strength threshold applicable to the 5G-specific coverage obligations stated in Question 48, consistently with the standard applicable to the existing 5G wholesale network. The existing ninety percent (90%) locality coverage threshold in Section 2.9.1 is clarified but is not amended.
>
> **Question 48 (Amendment and supplement).** Section 2.9 is supplemented by mandatory band-differentiated obligations applicable to the spectrum assigned under this RFA, comprising 5G coverage obligations in the 700 MHz band and deployment obligations in the 2.3 GHz and 3 GHz mid bands, including an initial mid-band deployment milestone of nine (9) months from the effective date.
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> **Question 49 (Amendment).** Section 2.9.3 is amended to replace the second-, third- and fifth-anniversary SMP rural population coverage milestones with fixed calendar milestones of forty percent (40%) by 1 December 2029, sixty percent (60%) by 1 December 2032 and

> eighty percent (80%) by 1 December 2035, together with the associated corridor, locality and regional-distribution requirements stated in that response.
>
> **Question 52 (Correction).** Section 2.9.3(2) is corrected by the deletion of the words "and rail", and the corridors to be covered under that provision are defined as all highways linking the sixteen regional capitals to one another.
>
> **Question 53 (Amendment).** The Rural Population denominator in Section 2.9.3 is modified by the exclusion of the population of localities served by active Rural Telephony Project sites.

This list is given for the assistance of Applicants. It does not limit the effect of any response in this document, and the responses themselves govern.

THEME 1 — ELIGIBILITY, OWNERSHIP AND PARTICIPATION

Question 1 — Whether an MVNO may hold spectrum under this RFA

Response. Yes, and no conflict arises with the Authority's MVNO framework.

The inclusion of MVNOs among the eligible categories in Section 3.1A is deliberate. Consistent with the objectives in Section 1.2 — effective competition, investment by established operators and new entrants alike, and broader access to spectrum — the Authority has opened this process to entities that do not presently operate their own radio access networks, so as to afford them a route to facilities-based operation.

The rule that an MVNO shall not possess spectrum is not displaced by this RFA, because an MVNO Applicant that is awarded spectrum does not remain an MVNO. It becomes a Mobile Network Operator and holds the assigned spectrum in that capacity, subject to the conditions of the spectrum licence and of the authorisation applicable to an MNO. To give effect to that change in status without disruption to subscribers, the Licence will include transitional arrangements for the migration of existing customers from the host network onto the Licensee's own network over a defined period.

An MVNO Applicant is subject to the same eligibility and qualification requirements as every other Applicant, without alleviation, including the Technical Qualification Requirements in Section 3.1B, and if awarded spectrum assumes in full the coverage, rollout, capacity, roaming and reporting obligations attaching to the licence.

Question 2 — Participation of a foreign strategic partner, and the ownership category applicable to a joint venture or special purpose vehicle

Response. Section 2.12 places Applicants in two categories. An Applicant that is itself an existing authorised operator falls within Section 2.12(1). An Applicant that is not an existing authorised operator falls within Section 2.12(2) and must be one hundred percent (100%) Ghanaian-owned.

A joint venture company or special purpose vehicle is treated in the same manner as any other Applicant. Its category is determined by the status of the Applicant itself, not by the identity of its promoters, shareholders, sponsors or intended partners. Accordingly, a joint venture company or special purpose vehicle newly incorporated for the purpose of participating in this RFA is not an existing authorised operator and must be one hundred percent (100%) Ghanaian-owned at the date of application, throughout the award process and at the point of award. The participation of an existing authorised operator or foreign person in promoting or sponsoring the vehicle does not alter that requirement.

An Applicant falling within Section 2.12(2) may nevertheless propose to operate with a strategic partner, including a foreign strategic partner, and may state that intention in its application. Where it does so, it should provide sufficient particulars of the proposed arrangement, including the identity and relevant experience of the partner; the nature and legal form of its proposed participation; the proposed ownership or contractual structure; and the intended timing. Where the Applicant relies on the proposed partner's capacity for its Network Design and Rollout Implementation Plan or Investment Plan, the supporting evidence must be provided in accordance with the responses to Questions 56 and 27.

The proposed participation of a strategic partner does not modify the ownership requirement or qualify an Applicant that does not satisfy it in its own right. Any post-award arrangement that would give a strategic partner an equity interest in, or control of, the Licensee requires the prior written approval of the Authority under Section 2.12. In considering such an arrangement, or any proposed transfer or acquisition of spectrum assigned under this RFA, the Authority will have regard to competition and market concentration, including whether the arrangement would result in undue concentration of spectrum holdings or otherwise harm competition.

An Applicant that is itself an existing authorised operator applies under Section 2.12(1), and any change in its ownership or control is subject to the applicable prior approval requirements under Section 2.12.

Question 3 — References in the RFA to the Ghana Investment Promotion Centre Act, 2013 (Act 865)

Response. The Authority addresses this matter of its own motion. Sections 2.12 and 3.1A(6) of the RFA, and Annex 1, refer to the Ghana Investment Promotion Centre Act, 2013 (Act 865) and to the Ghana Investment Promotion Centre. That Act has been repealed and replaced by the Ghana Investment Promotion Authority Act, 2026 (Act 1173), which was assented to on 15 July 2026, and the Centre is now the Ghana Investment Promotion Authority.

Those references are to be read as references to the Ghana Investment Promotion Authority Act, 2026 (Act 1173) and to the Ghana Investment Promotion Authority respectively, and the requirements they carry are to be satisfied under Act 1173. No other change is made to those provisions, and an application is not deficient by reason only of a reference in it to Act 865 or to the Centre.

THEME 2 — LEGAL AND PROCESS: RIGHTS, PRECEDENCE, TIMETABLE AND COMPLIANCE

Question 4 — Whether acceptance of the RFA terms waives clarification, review or statutory rights

Response. No. The confirmation in the Letter of Presentation (Annex 1) that an Applicant has read, understood and accepts the terms of the RFA is an acceptance of the terms on which this competitive process is conducted. It is not, and is not intended to operate as, a waiver of any statutory right, or of any right of recourse, that the law confers on a person dealing with the Authority. Rights and remedies available under the National Communications Authority Act, 2008 (Act 769), the Electronic Communications Act, 2008 (Act 775), and the general law are unaffected by that confirmation and are exercisable according to their own terms.

The confirmation does, however, mean that an Applicant may not participate in the process on terms of its own selection or subject to reservations of its own devising. An application qualified by reservations against the terms of the RFA may be treated as non-compliant.

Question 5 — Order of precedence, and the effect of legislative reform

Response. Precedence runs as follows.

Primary and subsidiary legislation prevails over all instruments in this process. Nothing in the RFA, in any clarification, or in a licence operates to displace Act 769, Act 775, the Electronic Communications Regulations, 2011 (L.I. 1991), or other applicable regulations, and each such instrument continues to apply according to its terms.

As between the RFA and the Authority's written clarifications, a clarification or addendum issued by the Authority forms part of the RFA (see the definition of "RFA" in Section 1.4) and, being later in time and issued to explain or correct, prevails over the original RFA text on the point it addresses.

As between the documents of this process and the spectrum licence ultimately issued, the Licence contains the definitive and binding conditions of the spectrum right and governs the relationship between the Authority and the Licensee once issued. The RFA and clarifications are the basis on which the award is made and inform the Licence, but the executed Licence is the operative instrument thereafter.

An Applicant's existing authorisations are separate instruments that continue according to their own terms and are neither enlarged nor diminished by this RFA save as expressly stated.

On legislative reform: the Authority conducts this process under the law in force. It cannot, and does not, fetter the future exercise of legislative power or of its own statutory functions, and no representation is made that the legal framework will remain unchanged over the fifteen-year licence term. Where future legislative or regulatory change bears on licence obligations, its effect on existing rights will be determined by that change and by the general law, including any transitional provisions it contains. This is a feature of the regulated environment generally and is not specific to this RFA.

Question 6 — Technology neutrality and the Licensee's existing spectrum holdings

Response. Section 2.8.2 is directed to the spectrum assigned under this Request for Applications: in that spectrum, a Licensee may deploy any radio access technology compliant with the applicable international standards, subject to the prevailing legal and regulatory framework.

This RFA does not alter the terms on which an Applicant holds spectrum assigned to it under any other instrument. As stated in the response to Question 5, an Applicant's existing authorisations are separate instruments which continue according to their own terms and are neither enlarged nor diminished by this RFA. Whether a particular existing assignment may be refarmed, and on what conditions, is governed by the terms of that assignment and by the Authority's prevailing framework, and requires the Authority's approval where that framework so provides. The Authority determines applications of that kind on their merits and in the ordinary course, and it would not be appropriate to determine them in the context of this Request for Applications. Nothing in this response constitutes an approval or a refusal of any refarming proposal.

Question 7 — Whether the evaluation methodology is fixed once applications are submitted

Response. The Authority's power under Section 3.6 to amend, suspend or cancel the RFA before the issue of licences is a power to be exercised where the Authority reasonably considers it necessary in the public interest or to preserve the fairness, integrity or orderly conduct of the process, and any exercise of it is notified promptly to all Applicants.

The Authority's clear intention is that the rules governing evaluation — the pass/fail standard for Technical Qualification under Section 3.3.2A and the ranking of Best Price Offers by price under Sections 3.3.3 to 3.3.5 — should be stable, and that Applicants should be able to prepare and submit on the faith of fixed rules. The Authority does not anticipate altering the evaluation methodology after applications have been submitted, and would not do so save where it became necessary for the overriding reasons stated in Section 3.6 and could be done consistently with the equal and fair treatment of all Applicants.

The Authority will not exercise the Section 3.6 power so as to disadvantage Applicants by reference to bid information: the qualification standard is applied without sight of any Best Price Offer (Section 3.3.2A(3)), and ranking is by price. The Authority does not, however, surrender the Section 3.6 power, which exists precisely to protect the integrity of the process for the benefit of all Applicants.

Question 8 — Extension of the deadline for submission of applications, and consequential adjustment of the timetable

Response. The timetable at Section 3.5 is expressed to be indicative, and Table 7 records that dates may be adjusted by the Authority on reasonable notice. Any adjustment is a matter for the Authority, exercised on reasonable notice and applied equally to all Applicants, consistent with Sections 3.5 and 3.6.

The adequacy of the period for the preparation of applications was raised in common by those attending the pre-application briefing held on 27 July 2026, and has also been raised in writing. The Authority has also, by this document, addressed a number of matters bearing on the preparation of applications, including the mandatory band-differentiated 5G obligations at Question 48, the ownership and participation matters at Question 2 and the correction at Question 3.

Having regard to those matters, and in the interest of the orderly conduct of the process and the equal treatment of all Applicants, the Authority has determined under Sections 3.5 and 3.6 to amend the timetable at Section 3.5 in two respects.

First, the deadline for the submission of applications is extended to 5:00 pm on Thursday, 27 August 2026, in place of 5:00 pm on Thursday, 6 August 2026, and each subsequent date in Table 7 is adjusted by twenty-one (21) calendar days, as set out in the revised Table 7 at Annex A to this document.

Secondly, and separately from that adjustment, the period for the payment of the Licence Fee is extended from thirty (30) days, as prescribed in the RFA as published, to sixty (60) days from notification of award, which is the Authority's standard period. Licence Fees accordingly fall due by Tuesday, 17 November 2026. This second amendment is made so that the period for payment is not compressed by the adjustment of the preceding process dates, and so that Applicants have the benefit of the Authority's standard payment period.

Three events are to be distinguished: notification of award; the deadline for payment of the Licence Fee; and the issue of the Licence. Payment of the full Licence Fee is a condition precedent to the issue of the Licence. Subject to satisfaction of all other applicable conditions, the Authority will issue the Licence within ten (10) Business Days after confirmed receipt of the full Licence Fee. The date of Tuesday, 17 November 2026 is accordingly the deadline for payment and not a date for the issue of licences; an Applicant that pays earlier may expect its Licence to issue correspondingly earlier.

The two amendments are cumulative. The date stated above for the payment of Licence Fees is derived from the extended sixty (60) day period and not from the adjustment of twenty-one (21) calendar days alone. Any date stated elsewhere in the RFA by reference to the timetable is adjusted accordingly, including the date for the submission of applications stated in the invitation at the front of the RFA and the date and time for the opening of Envelope A stated in Section 3.3.1(1).

This adjustment is made by the Authority on its own motion, having regard to the matters set out above and not at the instance of any individual Applicant. It applies to the process as a whole and to every Applicant equally; it is not granted to, and confers no advantage on, any individual Applicant. The requests received are disposed of by this adjustment, and no separate response will be issued to them. The requirements of Section 3.2 are unchanged, as is every other term of the RFA save as stated in this document.

The timetable adjustment does not, of itself, alter the coverage, rollout or capacity obligations in Section 2.9. In particular, obligations stated by reference to fixed calendar dates, including the National Population Coverage Obligation in Section 2.9.1 and the fixed SMP rural coverage milestones in Section 2.9.3, as amended by the response to Question 49, retain those dates; obligations keyed to the effective date of the licence continue to run from that date, as explained in the response to Question 9. This is without prejudice to the amendments, supplements and corrections to Section 2.9 expressly stated elsewhere in this document. See also the response to Question 57.

The Authority does not contemplate any further adjustment of the timetable, and Applicants should now plan on the basis of the revised dates. No extension will be granted to an individual Applicant, and an application received after 5:00 pm on Thursday, 27 August 2026 may be rejected under Section 3.2.1.

Question 9 — Licence effective date and the effect of delay

Response. The obligations that are keyed to the licence run, as the RFA states them, from the effective date of the licence — for example the coverage milestones measured from "the effective date of the licence" (Section 2.9.2), the reference-offer filing within ninety (90) days of the effective date, and the roaming readiness period of not more than six (6) months from the effective date (Section 2.10.2). The National Population Coverage Obligation in Section 2.9.1 is stated by reference to a fixed calendar date. The effective date of each licence will be stated in that licence.

As to automatic extension: the RFA does not provide for the automatic extension of obligations, and the Authority does not, through this response, create one. The Authority notes, however, that obligations keyed to the effective date of the licence necessarily run from that date and not before, so that an obligation expressed to run from the effective date does not begin to run until the licence takes effect. Where circumstances arise that bear on a Licensee's ability to meet a deadline, the appropriate route is the variation mechanism and the compliance and enforcement framework addressed in the response to Question 10 below, not an automatic adjustment.

Question 10 — Adjustment of rollout deadlines for events outside the Licensee's control, including delay attributable to third parties

Response. The coverage, rollout and capacity obligations are material conditions of the licence (Section 2.9), and the Authority monitors and enforces them under Section 2.11, which provides a graduated range of responses beginning with a directive to remedy a breach within a specified period. In assessing compliance and in exercising its enforcement discretion, the Authority acts proportionately and has regard to the circumstances of any shortfall, including the extent to which it is attributable to events genuinely outside the Licensee's reasonable control.

In addition, Section 2.9.4 expressly empowers the Authority, by directive and following consultation, to defer or accelerate a capacity phase or to vary the applicable rates where the assumptions underlying the obligations materially differ from experience.

The RFA does not, however, establish an automatic or self-executing force-majeure extension of the coverage deadlines, and Applicants should not assume one. A Licensee that considers its performance to be affected by matters outside its control should engage the Authority through the compliance and reporting framework in Sections 2.9.6 and 2.11; the Authority will deal with such matters on their merits.

As to delay attributable to tower companies, fibre and transmission providers, utility providers and permitting authorities: the selection of counterparties, the terms on which they are engaged, the sequencing of dependencies and the provision of contingency against them are ordinarily matters within the Licensee's own control, and they form part of the deliverability which the Network Design and Rollout Implementation Plan is required to demonstrate under Section 2.9.5.1. Reliance on a third party does not, of itself, convert a delay into an event outside the Licensee's reasonable control. The Authority does not exclude the possibility that the facts of a particular case may warrant a different view; but Applicants should neither plan nor price on the assumption of relief, and an Applicant that anticipates specific external dependencies should identify them, and the mitigations for them, in its Plan.

The Licence will contain specific provisions regarding force majeure, and the definitive treatment of relief for events beyond a Licensee's reasonable control will be as set out in the Licence.

Question 11 — Confidentiality of information submitted in Envelopes A and B

Response. Under Section 3.4.1 the Authority treats all commercial and technical information submitted by Applicants as confidential and uses that information solely for the purposes of this RFA, save where disclosure is required by law or is necessary to publish the Successful Applicants and the Licence Fees. Accordingly, an Applicant's technical, financial, vendor, network design, rollout, financing and business-plan information is not disclosed to competing Applicants.

What is made public by the process itself is limited to: the list of Qualified and Non-qualified Applicants (Section 3.3.2); the public opening and ranking of Best Price Offers (Section 3.3.3); and the identity of Successful Applicants and their Licence Fees (Section 3.4.1).

Disclosure required by law, or to bodies to whom the Authority is obliged or entitled to disclose in the discharge of its functions, is preserved by the "required by law" qualification in Section 3.4.1 and by the general law. Subject to those defined exceptions, the confidentiality protection applies to material in both envelopes.

Question 12 — Remedies against spectrum hoarding or warehousing

Response. The principal safeguards against warehousing are the coverage, rollout and capacity obligations in Section 2.9, together with the band-differentiated obligations applicable to the spectrum assigned under this RFA stated in the response to Question 48. The obligations in Section 2.9 are band- and technology-neutral, as explained in the response to Question 47; the obligations stated at Question 48 require the spectrum assigned under this RFA to be put into service on defined timelines. Each is a material condition of the licence. Non-use or under-use manifests as a failure to meet those obligations and is met with the enforcement measures in Section 2.11, which range from a directive to remedy, through administrative pecuniary penalties and reduction of the licence term, to suspension and, in cases of persistent or material non-compliance, revocation. Compliance is monitored through the quarterly reporting and independent verification regime in Section 2.9.6. The Authority regards the efficient use of assigned spectrum as a core objective of this process (Section 1.2) and will use the full range of its enforcement powers, together with its powers under Act 775, to address warehousing.

Question 13 — Timeframe for re-tender of unsold lots

Response. Section 3.3.6 provides that the Authority may retain any unsold lot for future assignment on such terms as it determines, and that any future assignment shall be at a price not less than the Minimum Reserve Price prevailing at the time. The RFA does not fix a timeframe for any such future assignment, and none should be inferred; the timing is a matter for the Authority's discretion, to be exercised in light of market conditions and spectrum-management considerations at the relevant time.

Applicants should therefore base their bidding decisions in this process on the opportunity presently before them, rather than on any assumption as to when, or on what terms, unsold spectrum might next be offered.

Question 14 — Treatment of wholesale and network-sharing commitments in evaluation

Response. Technical Qualification is assessed on a pass/fail basis and is not scored, weighted or ranked (Section 3.3.2A(2)); ranking is determined by price (Section 3.3.3). There is accordingly no mechanism by which a wholesale or network-sharing commitment earns an Applicant a higher score or an improved ranking, and Applicants should not frame their submissions on that premise.

Wholesale and roaming obligations arise as licence conditions rather than as scored bid elements. The wholesale national roaming obligation in Section 2.10.2 applies to a Licensee designated as holding Significant Market Power, and all Licensees must design their networks to support national roaming under Section 2.10.1. Network-sharing arrangements, including MORAN and MOCN configurations, and wholesale access arrangements, are permissible subject to the Authority's approval and to the prevailing regulatory framework.

To the extent an Applicant relies on sharing or wholesale arrangements to attain its rollout obligations, those arrangements should be reflected in its Network Design and Rollout Implementation Plan under Section 2.9.5.1, where they bear on the viability and attainability of the rollout that is assessed on a pass/fail basis.

Question 15 — Process, timeline and terms of 3 GHz rationalisation

Response. Rationalisation in the 3 GHz mid band is addressed at the level of principle in Sections 2.4.4 and 3.3.7. The following may be confirmed.

The process is a post-award one: it follows the conclusion of the bidding and award process, and is undertaken by the Authority in consultation with the affected Licensees, with a view to consolidating each Licensee's holding into a contiguous block. It is subject to a firm floor: rationalisation shall not result in any net reduction in the amount of spectrum awarded under this RFA. The Authority will publish the outcome in a Notice of Final Assignment (Section 3.3.7).

As to the specific matters raised, the process is one led and determined by the Authority, in consultation with affected Licensees, rather than one that places on a successful Applicant an obligation to negotiate bilaterally with any other assignment holder as a condition of receiving its award. The RFA does not create, and this response does not create, any mandatory wholesale-access relationship between a successful Applicant and any existing assignment holder in the sub-band.

In settling a rationalisation plan the Authority will consult the affected Licensees and will have regard to practical considerations of implementation, including service continuity and transition. Questions of process detail, notice periods, the treatment of any costs of retuning or migration, and implementation responsibilities are matters for the consultation and the resulting Notice of Final Assignment rather than for determination in this RFA, and the Authority will address them with the affected Licensees in that process.

The Authority's objective in consolidating holdings is to enhance, not impede, each Licensee's ability to deploy efficiently on a contiguous block, and the Authority will conduct the process with that objective and with the deployment interests of affected Licensees in mind.

THEME 3 — AWARD MECHANICS AND BID STRATEGY

Question 16 — Withdrawal of demand for a reduced number of lots

Response. No. An application, once submitted, is a firm and irrevocable offer to acquire each lot applied for at the Best Price Offer stated for that band, subject only to the lot restrictions and the award procedure in the RFA. The RFA does not provide for conditional, "all-or-nothing", or mutually contingent bids, and an Applicant may not make the acquisition of any lot contingent on the award of another lot, whether in the same band or across bands.

Two distinct mechanisms should not be conflated. First, the reduction contemplated by Section 3.3.5.1 arises only where the lot restrictions in Sections 2.2.3 (700 MHz) or 2.3.3 (2.3 GHz) would otherwise cause an Applicant to be awarded more lots than it is permitted to hold; in that event the Applicant is invited to identify its preferred lot or lots within five (5) Business Days, and a failure to respond entitles the Authority to determine the assignment. That provision governs which lots an over-allocated Applicant receives; it does not confer a right to decline an award. Second, in the 3 GHz mid band there is no lot restriction (Section 2.4.3), so the premise of the worked example does not arise there in any event.

Where an Applicant applies for a number of lots and is awarded fewer — whether through ranking under Section 3.3.4.1, confirmation at the MRP under Section 3.3.4.2, or the operation of the lot restrictions — the lots awarded are awarded, and the corresponding Licence Fees fall due under the timetable in Section 3.5. An Applicant that wishes to avoid acquiring a single lot in isolation should calibrate the lots for which it applies and the Best Price Offers it submits accordingly; the RFA does not permit that commercial risk to be transferred to the award process by way of a post-hoc withdrawal.

For the avoidance of doubt, this response does not limit the Authority's own powers under Section 3.6 to vary or cancel the process, which are exercisable by the Authority alone and confer no reciprocal right of withdrawal on an Applicant.

Question 17 — Bidding through more than one affiliated vehicle in the same band

Response. The lot restrictions in Sections 2.2.3 and 2.3.3 apply at group level, not merely at the level of the individual applying entity. Each restriction applies expressly to an Applicant "alone or together with its affiliates, subsidiaries, partners or shareholders". Accordingly, the lots applied for or held across all vehicles within the same corporate group are aggregated for the purpose of the two-lot cap in the 700 MHz band and the three-lot cap in the 2.3 GHz band. A group may not obtain, through multiple affiliated vehicles, a combined holding that exceeds what any single member of the group could hold.

The RFA does not, in terms, prohibit related entities from each submitting an application. However, Applicants are required under Section 3.4.2 to disclose any actual or potential conflict of interest, including common ownership, common directorships, or material commercial arrangements with another Applicant. Where affiliated entities apply in the same band, that relationship must be disclosed. Where the Authority determines that such a relationship compromises the integrity or fairness of the award process — including through the risk of coordinated bidding or the circumvention of the lot caps or of the eligibility restrictions in Sections 2.3.4 and 3.1A — it may require appropriate remedial measures or disqualify the affected Applicant or Applicants under Section 3.4.2.

Applicants should therefore not assume that structuring a bid across multiple group vehicles offers any advantage. It does not enlarge the group's permitted holding, it attracts mandatory disclosure, and it carries the risk of remedial action or disqualification where the Authority considers the arrangement prejudicial to the fairness of the process. A group intending to acquire spectrum in a given band is advised to do so through a single, clearly identified vehicle.

Question 18 — Specific or generic lots, and the assignment methodology

Response. Applicants bid for a defined quantum of spectrum in a band — that is, for a stated number of lots of the size fixed for that band — rather than for pre-identified frequency positions. This is reflected in the award procedure, which ranks Best Price Offers on a per-Lot basis within each band (Section 3.3.3) and awards lots by quantum, and in Section 3.2(11), which requires an Applicant to specify the total number of lots sought in each band. The lot tables (Tables 2, 3 and 4) define the size and number of lots and the band's frequency structure; they are not an invitation to bid for a particular numbered lot to the exclusion of others.

The identification of a specific sub-band is material only where the RFA itself distinguishes sub-bands. In the 3 GHz mid band, the offer comprises two distinct segments — 3300—3400 MHz and 3600—3650 MHz (Table 4) — which are not interchangeable for planning purposes. Accordingly, and consistent with the worked example in Section 3.2(11) and in Annex 1, an Applicant in the 3 GHz mid band must specify the sub-band in which it seeks its lot or lots. Subject to that, Applicants bid for quantum.

Assignment of specific frequency positions is made by the Authority following the award, on the following basis: the Authority will assign contiguous spectrum to each Successful Applicant wherever practicable, so as to maximise the efficiency of each Licensee's holding and of the band plan as a whole; assignment will take into account the quantum awarded to each Licensee, any sub-band specified, and the objective of avoiding fragmentation and minimising the need for guard bands. In the 3 GHz mid band specifically, the Authority may further undertake the spectrum rationalisation process under Sections 2.4.4 and 3.3.7, in consultation with the affected Licensees, to consolidate each Licensee's holding into a contiguous block; that process shall not reduce the quantum of spectrum awarded, and the Authority shall publish the outcome in a Notice of Final Assignment.

The Authority does not, in this RFA, guarantee any Applicant a particular numbered lot position within a band. An Applicant's valuation and network planning should therefore proceed on the basis of the quantum and sub-band applied for, and on the Authority's stated commitment to assign contiguous spectrum wherever practicable, rather than on the assumption of a specific pre-identified frequency block.

Question 19 — Whether a Licensee that does not deploy may resell the spectrum assigned to it

Response. This Request for Applications does not establish a secondary market in the spectrum it assigns, and it confers on no Licensee any right to sell, transfer, assign, sublicense, lease or otherwise dispose of the whole or any part of its assignment. A spectrum licence issued under this RFA is personal to the Licensee to whom it is issued.

Any transfer or disposal of the licence or of rights under it, and any change in the ownership or control of the Licensee, requires the prior written approval of the Authority under Section 2.12. The Authority grants or withholds such approval in the exercise of its statutory functions, having regard to the objectives of this licensing process set out in Section 1.2, to considerations of competition and market concentration, and to the circumstances then prevailing, including the Licensee's compliance with the coverage, rollout and capacity obligations. In particular, the Authority will apply competition and market concentration considerations in the approval of any transfer or acquisition of spectrum assigned under this RFA by a third party from a Successful Applicant, and may withhold approval where the transfer or acquisition would give rise to an undue concentration of spectrum holdings or would otherwise harm competition.

A Licensee that fails to deploy is in breach of material conditions of its licence, and the response to that breach is the enforcement regime in Section 2.11, which extends to administrative pecuniary penalties, reduction of the licence term, suspension and revocation. Non-deployment is therefore addressed by enforcement against the licence and by the return of the spectrum to the Authority, and not by permitting a Licensee to realise value from spectrum it has not used. The response to Question 12 sets out the Authority's position on warehousing more fully. Applicants should not prepare applications on the assumption that spectrum acquired under this RFA may be on-sold.

THEME 4 — SMP PREMIUM AND BID RANKING

Question 20 — Whether the SMP premium adjusts the SMP Applicant's Best Price Offer for ranking, and how second-round bids are ranked

Response. The SMP premium under Section 2.7 applies to the Minimum Reserve Price applicable to the SMP Applicant's bids; it raises the minimum price at or above which a lot may be awarded to that Applicant. It does not discount, uplift or otherwise adjust the SMP Applicant's Best Price Offer for the purposes of ranking. Best Price Offers are ranked strictly by the price offered per lot, in descending order, for all Applicants (Section 3.3.3(3)), and the same applies to any second-round bidding under Section 3.3.4.1(b). The sole effect of the premium is that no lot may be awarded to the SMP Applicant below its premium-adjusted Minimum Reserve Price (Section 3.3.4.2(a)).

Question 21 — Basis on which the SMP premium has been determined, and its proportionality

Response. The premium in Section 2.7 is an element of the Authority's pricing of the spectrum offered under this RFA. It is not a sanction or an SMP remedy under the Electronic Communications Act, 2008 (Act 775), and does not depend on any finding of contravention, anticompetitive conduct or inadequacy of existing SMP remedies.

The Minimum Reserve Price represents the minimum consideration at which the Authority is prepared to assign a national spectrum right for fifteen years. That value need not be uniform across Applicants. An Applicant with an established national network, existing subscriber base and spectrum holdings in adjacent or complementary bands may derive materially greater and more immediate economic value from additional spectrum than an Applicant building its market position from a standing start. The premium reflects that difference in attributable value and supports the objective in Section 1.2 of securing appropriate value for a public resource.

The use of SMP designation to identify the Applicant to which the premium applies does not convert the premium into an SMP remedy. The designation provides an established and published basis for identifying the Applicant whose market position gives rise to the difference in attributable value. The premium is imposed in the exercise of the Authority's power to determine the consideration on which spectrum is assigned.

The Authority has also had regard to proportionality. Rather than further restrict the Applicant's access to spectrum, the measure in Section 2.7 operates through pricing. The Applicant's exclusion from the 2.3 GHz band arises separately from its existing assignments in the 2.6 GHz band and is not a consequence of the premium. There is no aggregate spectrum cap, and no per-Applicant limit in the 3 GHz mid band, where the Applicant concerned may apply for all the spectrum offered. The 700 MHz lot restriction applies equally to all Applicants. The premium itself therefore neither excludes the Applicant from any spectrum for which it is otherwise eligible nor limits the number of lots it may seek to acquire; the extent of its participation within those eligibility parameters remains a matter for its commercial judgement.

The premium is also limited in scope. It applies only to the Minimum Reserve Price in the bands specified in Section 2.7; does not affect the Applicant's Best Price Offer for ranking purposes; and neither adds to nor substitutes for the SMP obligations in Sections 2.9.3 and 2.10.2.

The Authority does not publish its internal valuation modelling during a live competitive assignment process. The RFA nevertheless provides all Applicants, on equal terms, with the information required to participate, including the lot structure, applicable reserve prices, basis and application of the premium, and award procedure. Each Applicant remains free to determine its own Best Price Offer. The Authority may consider publication of further information on its reserve-pricing methodology after conclusion of the award process.

The determination in Section 2.7 is specific to this assignment and prevailing market circumstances. It does not establish a rule or policy for the pricing of future spectrum assignments.

Question 22 — Conduct of a second round of bidding, disclosure of offers, and the continuing application of the Minimum Reserve Price

Response. Where a band is oversubscribed within the meaning of Section 3.3.4.1, the Authority invites the relevant Applicants to submit a single improved sealed Best Price Offer. The following applies to that process.

Best Price Offers submitted in the first round are opened and ranked under Section 3.3.3, and it is inherent in that procedure that the first-round offers are known once they have been opened. The second round is a single sealed round. Each invited Applicant submits one improved offer, without knowledge of any other Applicant's second-round offer, and those offers are opened and ranked on the same basis as the first. There is no ascending or iterative bidding, no exchange of information between Applicants, and no disclosure of any second-round offer before opening.

An improved offer means an offer higher than that Applicant's own first-round Best Price Offer for the lot concerned. The Minimum Reserve Price continues to apply as a floor at every stage of the award process. It is not spent on the first round, and in the case of the Applicant to which Section 2.7 applies the premium-adjusted Minimum Reserve Price continues to apply to its second-round offers, consistently with Section 3.3.4.2(a). Lots are then awarded in descending order of the second-round Best Price Offers, subject to the lot restrictions in Sections 2.2.3 and 2.3.3.

Question 23 — Whether offers are compared in absolute terms or by reference to the reserve price applicable to each Applicant

Response. Ranking is by the absolute price offered per lot, expressed in United States Dollars, in descending order across all Applicants. It is not adjusted, normalised or weighted by reference to the Minimum Reserve Price applicable to any Applicant, by reference to the margin by which an offer exceeds the reserve applicable to the Applicant making it, or by reference to any Applicant's size or market position.

Accordingly, where two offers are made for a lot in the same band, the higher figure ranks above the lower, notwithstanding that the lower figure may exceed the reserve applicable to the Applicant making it by the greater proportion. The premium under Section 2.7 raises the floor below which a lot may not be awarded to the Applicant to which it applies; it confers no ranking advantage on any other Applicant, and no other Applicant receives any corresponding discount, handicap or credit. See also the responses to Questions 20 and 22.

THEME 5 — FINANCE: FEES, NET REVENUE, PAYMENT AND FUNDING

Three of the queries in this theme (Questions 24, 25 and 26) turn on the same underlying point — the base to which the recurring contributions apply — and are addressed together where that aids clarity, though each is answered in turn.

Question 24 — Definition of Net Revenue and the base to which the recurring contributions apply

Response. For the purposes of this RFA, Net Revenue has the meaning given in Section 1.4: Gross Revenue less Value Added Tax, the National Health Insurance Levy, the GETFund Levy, the Communication Service Tax and, where applicable, Local Voice Interconnection Cost, computed on the basis of gross revenue as recognised in the Licensee's audited financial statements prepared in accordance with International Financial Reporting Standards, with no amount already excluded from revenue under IFRS being deducted again. As Section 1.4 states, the definitive definition and computation of Net Revenue is that set out in the Licence.

The recurring contributions under Sections 2.8.4 and 2.8.5 are computed on the Licensee's Net Revenue as so defined. Net Revenue is not confined to revenue attributable to the spectrum awarded under this RFA or to 5G-specific services. This treatment is consistent with the character of these charges as regulatory and universal-service contributions assessed on the Licensee's regulated telecommunications revenue, rather than as a royalty on the use of a particular block of spectrum.

The one-off consideration for the spectrum itself is the Licence Fee determined under Chapter 3. The recurring contributions in Section 2.8 are separate from that one-off Licence Fee and, as explained in the response to Question 25 below, are the contributions already applicable under the prevailing framework rather than charges specific to this award.

Question 25 — Whether the recurring contributions are incremental, and the revenue base

Response. The 1.3% annual regulatory fee under Section 2.8.4 and the 1% GIFEC contribution under Section 2.8.5 are not new or additional charges introduced by, or specific to, the award of spectrum under this RFA. They are the regulatory and GIFEC contributions already applicable under the prevailing framework, restated in the RFA for completeness and transparency. The percentages quoted are the applicable fees in force and apply on the same basis as for all spectrum and telecommunications licences.

Accordingly, for an existing licensed operator, no separate or duplicate liability arises from an award under this RFA. Such an operator continues to pay the applicable regulatory and GIFEC contributions under the prevailing framework; the RFA does not impose a second or incremental charge on top of that framework, and does not consolidate, replace or set off any fee or levy already applicable to the operator, all of which continue according to their terms.

For a new entrant that does not currently hold an authorisation from the Authority, these contributions are not additional charges either; they are the same contributions in force under the prevailing framework, which begin to apply to that entity upon its becoming a Licensee, on the same basis as for every other licensee.

The contributions are computed on Net Revenue as defined in Section 1.4 and are not limited to revenue generated using the awarded spectrum or to 5G-specific services (see the response to Question 24 above). The definitive position will be reflected in the Licence.

Question 26 — Whether funding evidence must cover both the Licence Fee and rollout

Response. Yes. The Investment Plan required under Section 2.9.5.2 must demonstrate credible funding, whether committed or reasonably available, sufficient to fund the deployment and aligned to the rollout milestones. Separately, the Licence Fee becomes payable following notification of award and must be paid within the period stated in the timetable (see the response to Question 28 below). An Applicant's funding evidence should therefore address both the consideration payable for the spectrum on award and the capital and operating expenditure required to meet the coverage, rollout and capacity obligations across the phased milestones in Sections 2.9.1 to 2.9.4. The Applicant's ability to meet the consideration payable on award is assessed as part of its overall financial capacity under Section 2.9.5.2, in the round and in the manner described in the response to Question 27; it is not a separate qualification criterion additional to those stated in the RFA. Applicants should note, however, that payment of the Licence Fee in full and within the period stated in the timetable is a condition of the issue of the licence, as explained in the responses to Questions 28 and 31. Funding evidence that leaves the Authority unable to be satisfied that an Applicant can meet both the consideration payable on award and the expenditure required by the rollout it proposes may accordingly result in the Investment Plan being found deficient under Section 3.3.2A, subject to the single clarification-and-cure opportunity in Section 3.3.2B.

Question 27 — Assessment of financial capacity and acceptable funding evidence

Response. Technical Qualification is assessed on a pass/fail basis under Section 3.3.2A. On the financial limb, an Applicant passes where the Authority is reasonably satisfied that the Investment Plan addresses all of the minimum requirements in Section 2.9.5.2 and demonstrates credible funding — whether committed or reasonably available — sufficient to fund the deployment and aligned to the rollout milestones. The standard is one of credible, sufficient and appropriately evidenced funding, assessed in the round; it is not a mechanical checklist, and the Authority does not pre-certify any single instrument as sufficient in isolation.

The forms of evidence commonly submitted are, in principle, capable of contributing to a satisfactory demonstration of funding. As a general guide, and without fettering the Authority's assessment on the facts of each application: fully committed funding carries the greatest evidential weight; board-approved facilities, executed term sheets, vendor-financing arrangements and shareholder support are each relevant and may, individually or in combination, establish that funding is committed or reasonably available.

The weight attaching to any instrument will depend on how firm, unconditional and proximate to drawdown it is, on its sufficiency relative to the phased capital and operating expenditure forecast required under Section 2.9.5.2, and on its internal consistency with the Network Design and Rollout Implementation Plan as required by Section 3.3.2A(c). A conditional or non-binding instrument will be weighed according to the conditions attaching to it. Applicants are encouraged to submit the strongest available combination rather than to rely on any single document.

Question 28 — Whether the Licence Fee may be paid in instalments

Response. The Minimum Reserve Prices in Table 5 are stated to be payable upfront upon licence award, and the Licence Fee is payable within the period stated in the timetable at Section 3.5. That period was thirty (30) days in the RFA as published. It is extended by this document to sixty (60) days from notification of award, which is the Authority's standard period, as stated in the Notice at the head of this document and in the response to Question 8. The Licence Fee accordingly falls due by Tuesday, 17 November 2026. The RFA does not provide for payment of the Licence Fee by instalments.

The full Licence Fee for each lot awarded is payable within sixty (60) days of notification of award. Payment in full is a condition precedent to the issue of the Licence. Subject to satisfaction of all other applicable conditions, the Authority will issue the Licence within ten (10) Business Days after confirmed receipt of the full Licence Fee. An Applicant should plan on that basis.

Question 29 — Currency of payment

Response. The Minimum Reserve Prices and the Best Price Offer are denominated in United States Dollars (Section 2.6 and the definition of "Best Price Offer" in Section 1.4), and the Licence Fee is accordingly determined and expressed in United States Dollars. The non-refundable application fee, by contrast, is fixed in Ghana Cedis at GHS 300,000.00 per band and is payable by Banker's Draft drawable on a bank in Ghana (Section 2.6).

The Licence Fee obligation is a United States Dollar obligation. It may be discharged in the Ghana Cedi equivalent of the United States Dollar amount, converted at the prevailing rate at the time of payment. The remaining mechanics of settlement will be dealt with at the point of award and in the Licence, consistent with the prevailing requirements of the Bank of Ghana and applicable law; the RFA does not vary those requirements.

Question 30 — Request for the draft licence

Response. The material terms on which spectrum is offered under this process — including the licence duration, the recurring contributions, the coverage, rollout, capacity, roaming and reporting obligations, the ownership requirements and the enforcement regime — are set out in Chapter 2 of the RFA, and the definition of Net Revenue is given in Section 1.4. The Authority considers that the RFA provides a sufficient basis for the preparation of applications and Best Price Offers.

The Licence itself will contain the definitive and complete conditions, including the definitive computation of Net Revenue as contemplated by Section 1.4. Where the Authority issues any clarification or addendum in response to queries under this process, it forms part of the RFA under the definition in Section 1.4 and Applicants may rely on it accordingly.

Consistent with the approach taken across this RFA, Successful Applicants, before the issue of their licences, may make written representations on the final terms of the licence, in accordance with the standard position stated at the head of this document.

Question 31 — Payment by instalments, and security in place of payment

Response. The response to Question 28 applies. The RFA makes no provision for payment of the Licence Fee by instalments. The full Licence Fee for each lot awarded falls due within the period stated in the timetable at Section 3.5, as extended under the response to Question 8 to sixty (60) days from notification of award, that is by Tuesday, 17 November 2026. Payment in full is a condition precedent to the issue of the Licence, which issues within ten (10) Business Days after confirmed receipt of the full Licence Fee, subject to satisfaction of all other applicable conditions.

Nor does the RFA provide for any part of the Licence Fee to be secured rather than paid. An irrevocable bank guarantee or a standby letter of credit is an instrument of security; it is not payment, and the Authority does not accept such an instrument in substitution for any part of the Licence Fee. Applicants should proceed on the basis that the whole of the Licence Fee is payable in cleared funds within that period, and should calibrate the lots for which they apply and the Best Price Offers they submit accordingly. The response to Question 26 addresses the funding evidence required at application stage, which must cover both the consideration payable on award and the expenditure required to meet the rollout obligations.

THEME 6 — SMP OBLIGATIONS: SCOPE, DURATION AND VARIATION

Question 32 — Whether SMP obligations apply only if designated SMP at the effective date, or may be imposed, varied or withdrawn during the term as status changes

Response. The SMP-specific obligations in Sections 2.9.3 and 2.10.2 apply to a Licensee for so long as the Licensee is designated as having Significant Market Power (SMP) during the Licence Term, irrespective of whether it holds that designation on the effective date. Accordingly, those obligations may become applicable, be varied, or cease to apply during the Licence Term as the Licensee's SMP designation changes.

The obligations are competition remedies arising from SMP status and are imposed, reviewed, varied or withdrawn in accordance with the Authority's powers under the Electronic Communications Act, 2008 (Act 775), designation being governed by Sections 20(10) to (13) of that Act and the remedies by Section 20(8). They are therefore neither fixed by a Licensee's SMP status on the effective date nor applicable irrespective of its subsequent SMP designation.

Where a Licensee first becomes subject to the SMP coverage obligations after one or more of the fixed compliance dates in Section 2.9.3 have passed, those dates shall not operate retrospectively. The Authority shall, as part of the applicable SMP determination or remedial process, specify a reasonable prospective period for attainment of the corresponding obligation, having regard to the Licensee's existing coverage, network footprint and the date on which the obligation became applicable.

Question 33 — Whether SMP designation is reviewed during the term, and whether a review would retroactively alter obligations on spectrum already awarded

Response. SMP designation is determined through the Authority's market-review processes under Act 775, in accordance with the definition of significant market power and the designation methodology in Sections 20(10) to (13) of that Act, and is not fixed by this RFA. The SMP obligations apply according to the Licensee's designation as it subsists from time to time. A change in designation following a review would affect the application of those obligations prospectively; it does not operate retrospectively. Accordingly, a subsequent SMP designation shall not place a Licensee retrospectively in breach of a fixed SMP coverage milestone that fell due before the designation became effective. See also the response to Question 32.

Question 34 — Duration, review and termination of the wholesale roaming obligation, and whether it may be reduced or withdrawn once requesting operators reach their own coverage

Response. The wholesale national roaming obligation in Section 2.10.2 applies for so long as the Licensee is designated as an SMP operator. The reference offer is filed with and approved by the Authority (Section 2.10.2(2)), and terms, pricing and service levels are subject to the Authority's oversight and dispute-resolution process (Section 2.10.2(4)). The obligation is reviewed by reference to the Licensee's SMP status and prevailing market conditions rather than by automatic reference to any individual operator's coverage. The Authority will consider representations on the continuing need for the remedy in the ordinary course of its market reviews.

Question 35 — Accelerated attainment of High-Value Coverage Area capacity targets: whether it applies to 5G specifically or the whole network, and what criteria, notice and consultation apply

Response. The capacity and throughput obligations in Section 2.9.4 are technology-neutral and apply to the network deployed by the Licensee to meet its obligations under this RFA; they are not confined to any single radio access technology. Any accelerated attainment of High-Value Coverage Area capacity targets in respect of an SMP Licensee would be effected by directive following consultation, having regard to prevailing mobile data demand and traffic, as provided in Section 2.9.4. The Authority will have regard to technical and economic feasibility in any such consultation.

The band-differentiated obligations applicable to the spectrum assigned under this RFA, stated in the response to Question 48, are separate from and additional to the capacity obligations in Section 2.9.4, and are unaffected by any accelerated attainment directive under that Section.

Question 36 — Whether the Authority intends to use its licence-amendment power to impose wholesale-access conditions on 2026 winners at a future date

Response. The Authority's powers under the Electronic Communications Act, 2008 (Act 775), including any power to amend licences, are exercised in accordance with the Act and applicable due-process requirements, on the facts and circumstances prevailing at the relevant time. It would not be appropriate for the Authority to speculate, in the context of this Request for Applications, on the hypothetical future exercise of its statutory powers. Applicants apply on the basis of the terms set out in this RFA and the applicable legal and regulatory framework.

THEME 7 — NATIONAL ROAMING AND NETWORK SHARING

Question 37 — How 'principal cost' for national roaming will be determined and approved, and whether existing cost models apply or new cost studies are required

Response. The reference in Section 2.10.2(1) to pricing "at principal cost" means cost-oriented (cost-based) pricing: the efficiently incurred costs of providing the service, together with a reasonable return on the capital employed. It does not mean accounting cost without a return and does not require a Licensee to provide national roaming at a loss. For the avoidance of doubt, and for the purposes of Section 2.10.2(1), the words "at principal cost" are to be read as "on a cost-oriented basis", that expression bearing the meaning given to it in Section 20(8)(a) of the Electronic Communications Act, 2008 (Act 775) and in the Authority's prevailing framework.

Under Section 25(1) of the Electronic Communications Act, 2008 (Act 775), tariffs are determined by service providers in accordance with supply and demand, except where a price regulation regime applies. In the case of an operator designated as having Significant Market Power, Section 20(8)(a) provides for the operator to establish prices for its individual network and service elements on a cost-oriented basis specified by the Authority. The Authority does not, by this RFA or through this clarification process, prescribe the wholesale roaming price. The applicable price remains subject to the Authority's oversight and approval in accordance with the existing SMP remedies and Act 775.

The Licensees concerned may negotiate the proposed wholesale roaming price in the first instance, subject throughout to the requirement of cost orientation and to the Authority's approval, and the Authority will facilitate that process. Where the applicable cost basis requires specification, the Authority will determine the appropriate methodology in accordance with Act 775, including Section 20(8)(a) and (b), following consultation with the Licensees concerned. The Authority will apply its prevailing cost-modelling framework for wholesale services and may require a specific cost study where necessary.

National roaming is not an obligation created for the first time by this RFA. It forms part of the obligations imposed under the Authority's 2020 SMP designation, which remains in force. Section 2.10.2 carries that obligation into the Licence in respect of the spectrum assigned under this RFA; it does not displace or duplicate the existing obligation.

The national roaming reference offer must be filed with and approved by the Authority under Section 2.10.2(2), and pricing must be non-discriminatory. Section 25(3) of Act 775 also requires rates to be fair and reasonable and prohibits discrimination among similarly situated persons, including between the Licensee itself, its affiliates and an unaffiliated operator. Nothing in this response withdraws or qualifies the obligation in Section 2.10.2. The position of an operator requesting national roaming is addressed in the response to Question 42.

Question 38 — Whether the six-month roaming readiness period may allow phased implementation aligned to coverage rollout, and what readiness criteria apply

Response. The readiness period in Section 2.10.2(3) requires the SMP Licensee to have in place, within six months of the effective date, the technical and commercial arrangements necessary to make national roaming available to qualifying operators — namely the inter-operator (inter-PLMN) interfaces and supporting billing, policy and charging capability contemplated by Section 2.10.1, together with a reference offer approved under Section 2.10.2(2). Readiness in this sense concerns the capability to provide national roaming on request; it is not defined by reference to the SMP Licensee's own coverage rollout, and the period is not phased to those milestones. The purpose of the obligation is to make roaming available to qualifying operators at an early stage. The standard position on representations concerning final licence terms stated at the head of this document applies.

Question 39 — Which bands and configurations must support the roaming network-design requirement, and how roaming dimensioning aligns with the coverage and throughput obligations

Response. The national roaming network-design requirement in Section 2.10.1 applies to the network the Licensee deploys under this RFA and is not confined to a particular band; it requires support for the prevailing 3GPP inter-operator (inter-PLMN) roaming specifications and GSMA guidelines, together with the supporting systems identified in that Section. Dimensioning to accommodate national roaming is part of the Licensee's own network design and should be planned consistently with the coverage and throughput obligations in Section 2.9.4. The Authority does not prescribe separate roaming-specific capacity targets.

Question 40 — Whether the Authority expressly allows MORAN and MOCN arrangements

Response. Network-sharing arrangements, including Multi-Operator Radio Access Network (MORAN) and Multi-Operator Core Network (MOCN) configurations, are not precluded by this RFA and are consistent with its technology-neutral approach. Any such arrangement is subject to the prior approval of the Authority and to compliance with the applicable competition-law and regulatory requirements, and will be assessed on its terms. Nothing in a sharing arrangement relieves a Licensee of its individual obligations under the licence.

Question 41 — Whether there will be a separate roaming regime for 5G, or existing roaming rules apply

Response. This RFA does not establish a separate roaming regime specific to 5G. The national roaming obligations in Section 2.10 apply to the networks and services provided under the licences awarded, alongside the Authority's prevailing roaming framework as updated from time to time. The technical scope in Section 2.10.1 expressly includes 5G core roaming interfaces.

Question 42 — Position of non-SMP Licensees: whether the regulated roaming tariff is available as a default where commercial negotiation fails

Response. A distinction must be drawn between a non-SMP Licensee requesting roaming and a non-SMP Licensee from whom roaming is requested.

Where roaming is requested from a Licensee designated as having Significant Market Power, Section 2.10.2 applies for the benefit of all other licensed mobile operators in Ghana. A non-SMP Licensee requesting national roaming from an SMP Licensee therefore has the benefit of the reference offer filed with and approved by the Authority, the non-discrimination and cost-oriented pricing requirements, and the Authority's oversight and dispute-resolution process under Section 2.10.2. Its entitlement to those protections does not depend on bilateral agreement with the SMP Licensee. The determination and approval of the applicable pricing are addressed in the response to Question 37. Section 25(3) of the Electronic Communications Act, 2008 (Act 775) also requires rates to be fair and reasonable and prohibits discrimination among similarly situated persons.

Where neither operator is designated as having Significant Market Power, Section 2.10.3 applies and roaming is a matter for commercial negotiation. The approved reference offer and cost-oriented pricing requirements in Section 2.10.2 arise from the SMP obligation and do not operate as a default tariff between non-SMP Licensees. For the avoidance of doubt, the words "or per the regulated tariff in force" in Section 2.10.3 refer only to a regulated tariff that independently applies to the parties concerned under the prevailing regulatory framework; Section 2.10.2 does not create such a tariff as between two Licensees neither of which is designated as having Significant Market Power. The RFA therefore does not create a general entitlement to national roaming on regulated terms where the operator from whom roaming is requested is not designated as having SMP. The Authority's statutory powers relating to interconnection, access and dispute resolution remain unaffected.

All Licensees, whether or not designated as having Significant Market Power, must design, dimension and configure their networks to support national roaming in accordance with Section 2.10.1.

Question 43 — Whether national roaming may be used to attain the national population coverage obligation

Response. No. Coverage available to a Licensee's subscribers by virtue of the Licensee being a roaming customer on another operator's network is not qualifying coverage provided by that Licensee, and it does not of itself discharge the Licensee's obligations under Sections 2.9.1 to 2.9.4. The coverage obligations are obligations to deploy, and the response to Question 55 applies.

National roaming may of course be used commercially to extend the service experienced by a Licensee's subscribers, and nothing in this RFA discourages it; it is simply not counted as the Licensee's own qualifying coverage for the purposes of compliance. Coverage that the Licensee provides over its own radio access network by means of an approved infrastructure- or network-sharing arrangement, including the MORAN and MOCN configurations addressed at Question 40, is treated differently and does count — but only where the Licensee's own spectrum forms part of the deployment providing that coverage. Where the Licensee makes no spectrum contribution to the shared deployment, the coverage is not the Licensee's own qualifying coverage and is treated as roaming. See the responses to Questions 55 and 56.

THEME 8 — COVERAGE OBLIGATIONS: TECHNICAL SCOPE

Question 44 — What radio propagation or coverage model must be used for modelling coverage commitments

Response. Applicants may use recognised, internationally accepted radio propagation models appropriate to each band (for example the relevant ITU-R P-series recommendations), stating and justifying the model and key parameters in the Network Design and Rollout Implementation Plan. Compliance with the coverage and throughput obligations is assessed by the Authority against field-measured outcomes — the minimum user-experienced downlink rate at the cell edge with at least 85% location coverage probability under representative busy-hour loading (Section 2.9.4) — verified by the means set out in Section 2.9.6. The Authority does not mandate a single proprietary planning model; the obligation is defined by measured performance rather than by a specified prediction tool.

Question 45 — Clarity on the signal level for 'qualifying coverage'

Response. 'Qualifying coverage' is defined in Section 2.9.1. It means the outdoor availability of mobile broadband service signals meeting the Authority's prevailing quality-of-service and signal-strength thresholds, as set out in the Authority's QoS framework referred to in Section 2.9.5.1(6). Compliance is measured against that standard, in the manner stated below. Applicants should design to those thresholds; the Authority will verify against them under Section 2.9.6.

The Authority's prevailing quality-of-service framework comprises separate instruments for 2G, 3G and 4G. Qualifying coverage is assessed against the thresholds applicable to the technology by which the coverage relied upon is delivered. Because this document imposes mandatory 5G-specific coverage obligations at Question 48, the Authority specifies the applicable 5G signal-strength metric and threshold now so that Applicants may design and price their applications against a known standard.

For the purposes of the 5G-specific coverage obligations stated in the response to Question 48, the reference signal-strength metric for 5G New Radio (NR) shall be Synchronisation Signal Reference Signal Received Power (SS-RSRP). Qualifying outdoor 5G coverage shall require an SS-RSRP greater than minus one hundred and five decibel-milliwatts (-105 dBm), consistently with the signal-strength standard applicable to the existing 5G wholesale network. Any 5G thresholds subsequently specified in the Authority's prevailing quality-of-service framework shall apply in the ordinary way to the Licensee's other obligations under that framework. This signal-strength criterion is additional to, and does not substitute for, the applicable user-experienced throughput and location-coverage-probability requirements in Section 2.9.4.

Compliance with a locality-based coverage obligation is measured against the population of the locality and not against the presence of a site. Consistently with Section 2.9.1, a regional capital, Metropolitan Assembly capital, Municipal or District Assembly capital, or other locality required to be covered under Section 2.9 or Question 48 shall be treated as covered only where qualifying coverage is available to not less than ninety percent (90%) of the population of that locality, assessed by reference to the 2021 Population and Housing Census. The availability of service at a single point within a locality, or the presence of one or more sites within it, does not of itself establish qualifying coverage of that locality. Coverage shall be demonstrated through the predicted coverage modelling submitted under Section 2.9.5.1 and verified by drive test or equivalent measurement under Section 2.9.6.

Question 46 — Required granularity of MMDA coverage and capacity submissions: whether site-level data is required, or aggregated MMDA-level modelling is sufficient

Response. The Network Design and Rollout Implementation Plan must present expected coverage and capacity at MMDA level, supported by cell-count estimates and site typology (Section 2.9.5.1(2)). Aggregated MMDA-level modelling of coverage and capacity is sufficient for the application; a full site-by-site database is not required at submission. The Authority may seek clarification of any element under Sections 2.9.5.2 and 3.3.2B.

Question 47 — Confirmation that coverage may be achieved with any band, without separate low-band and high-band percentages

Response. The coverage obligations in Sections 2.9.1 to 2.9.3 are defined by population and locality thresholds and by the user-experienced performance requirements in Section 2.9.4. They are band- and technology-neutral (Section 2.8.2). The RFA does not impose separate low-band and high-band coverage percentages, nor any requirement to deploy in rural areas before urban areas. An Applicant may meet the obligations using any combination of the spectrum it holds, provided the specified outcomes are achieved.

Question 48 — Band-differentiated coverage and deployment obligations for spectrum assigned under this RFA

Response. This response **supplements Section 2.9 of the RFA and constitutes an amendment to the RFA within the meaning of the definition of "RFA" in Section 1.4**. The obligations stated below are mandatory licence obligations; they are not indicative future licence terms. The Authority addresses the matter having regard to the concerns raised regarding capital expenditure, equipment lead times and the differing propagation and capacity characteristics of the bands offered, and has adjusted the timetable at Section 3.5, as stated in the Notice at the head of this document, so that Applicants may reflect these obligations in their network design, investment planning and Best Price Offers. Two distinct obligations apply.

First, the coverage obligations in Sections 2.9.1 to 2.9.3 concern the availability of mobile broadband service to the population of Ghana. They are band and technology-neutral and may be met using any combination of spectrum held by the Licensee, as explained in the responses to Questions 47, 49 and 57. The band-differentiated obligations introduced by this response do not replace or modify those underlying coverage obligations, which continue to apply subject to the amendments and corrections expressly stated elsewhere in this document.

Second, spectrum assigned under this RFA must itself be put into service. The Licence will therefore include band-specific obligations to that end. Those obligations are differentiated by band to reflect the different characteristics and intended uses of the 700 MHz, 2.3 GHz and 3 GHz bands. **They are additional to, and do not replace or qualify, the obligations in Sections 2.9.1 to 2.9.3.**

The Authority has calibrated the obligations to secure early deployment of 5G while recognising the different propagation and capacity characteristics of the bands and reasonable deployment lead times. The following requirements will accordingly apply:

700 MHz. A Licensee assigned one or more lots in the 700 MHz band shall provide qualifying 5G coverage using the spectrum assigned to it in that band:

- in each of the sixteen regional capitals within six (6) months of the effective date;
- to not less than forty percent (40%) of the population of Ghana, and in not fewer than thirty (30) Municipal and District Assembly capitals outside the sixteen regional capitals, within eighteen (18) months of the effective date;
- to not less than fifty percent (50%) of the population of Ghana within thirty-six (36) months of the effective date; and
- to not less than seventy percent (70%) of the population of Ghana within sixty (60) months of the effective date,

in each case meeting the applicable user-experienced performance requirements in Section 2.9.4.

For the purposes of the locality-based obligations in this limb, a regional, Municipal or District Assembly capital shall be treated as covered only where qualifying 5G coverage using the spectrum assigned to the Licensee in the 700 MHz band is available to not less than ninety percent (90%) of the population of that locality. The presence of one or more 5G sites within a locality does not, of itself, constitute coverage of that locality.

The national population coverage percentages stated in this limb shall be computed against the population of Ghana recorded in the 2021 Population and Housing Census, fixed as at the effective date of the licence, consistently with the response to Question 51.

2.3 GHz and 3 GHz. A Licensee assigned one or more lots in either mid band shall deploy the spectrum assigned to it in that band:

- in the Greater Accra Coverage Area, as defined in Section 2.9.1, within nine (9) months of the effective date;
- in each of the six Metropolitan Assembly capitals within twelve (12) months of the effective date; and
- in all High-Value Coverage Areas, and in not fewer than forty (40) Municipal Assembly capitals, within thirty-six (36) months of the effective date,

in each case meeting the applicable user-experienced performance requirements in Section 2.9.4.

The obligations in the two limbs are measured differently. The 700 MHz obligation is an obligation to provide qualifying coverage, and compliance is assessed as stated in the response to Question 45. The obligations in the 2.3 GHz and 3 GHz bands are obligations to bring the assigned spectrum into service in the areas stated, those bands being capacity bands; they are not obligations to attain a stated percentage of population coverage in those areas. The assigned mid-band spectrum is treated as deployed in an area only where it is in service and carrying subscriber traffic at not fewer than twenty percent (20%) of the Licensee's broadband-capable active radio sites in that area. Deployment at a single site does not constitute deployment in an area.

For the purposes of that test: (a) a broadband-capable active radio site is a site of the Licensee that is in service in the area concerned and configured to carry mobile broadband traffic on 4G or 5G, and a site carrying only 2G or 3G service is excluded from the denominator; (b) where a site is operated under an approved MORAN or MOCN arrangement, it is counted in the denominator of each Licensee whose network is carried on it, and in the numerator of a Licensee only where that Licensee's own assigned mid-band spectrum is in service at the site; and (c) where a Licensee is assigned spectrum in both the 2.3 GHz and the 3 GHz mid bands, the twenty percent (20%) threshold applies separately to the Licensee's assignment in each band.

For the avoidance of doubt, each obligation stated in this response attaches to the Licensee's assignment in the band concerned taken as a whole, and not to each lot separately. A Licensee assigned two lots in the 700 MHz band discharges the 700 MHz obligation by deploying its aggregate assignment in that band over the areas and to the thresholds stated, and is not required to deploy each lot separately over that footprint. The same applies to a Licensee assigned more than one lot in the 2.3 GHz or 3 GHz mid band.

An Applicant awarded spectrum in more than one band must satisfy the obligations applicable to each band. A Licensee assigned lots in one band only carries the obligations applicable to that band and no other. An Applicant may propose a more ambitious deployment profile in its Network Design and Rollout Implementation Plan under Section 2.9.5.1.

Question 49 — SMP rural coverage obligations: technology neutrality and the revised Section 2.9.3 milestones

Response. No. The SMP rural coverage obligations in Section 2.9.3 are technology-neutral. They may be met using any radio access technology and any spectrum lawfully held by the Licensee, provided the applicable qualifying-coverage and user-experienced performance requirements in Section 2.9.4 are achieved. The fact that those obligations are contained in a Request for Applications for spectrum intended to support 5G does not convert them into obligations to deploy 5G in rural areas. A Licensee may introduce any compliant technology that delivers the required performance, and may phase the introduction of 5G in rural areas according to its own network plan.

The Authority has reviewed the interaction between Section 2.9.3 and the technology-neutral coverage obligations already applicable to the existing SMP operator under its current licences. It is not the Authority's intention that the acquisition of additional spectrum under this RFA should, merely by the issue of a new licence, materially accelerate an equivalent existing technology-neutral rural coverage commitment. Section 2.9.3 is accordingly amended so that the first SMP rural population coverage milestone is forty percent (40%) of the Rural Population by 1 December 2029.

The Authority does not, however, consider that the longer intervals in legacy technology-specific licences should determine the subsequent progression of rural coverage under the new licence. Having regard to the SMP Licensee's established network footprint, spectrum resources, current market position and deployment capability, the subsequent rural population coverage milestones are set at sixty percent (60%) by 1 December 2032 and eighty percent (80%) by 1 December 2035.

The milestones in Section 2.9.3 are accordingly as follows.

By 1 December 2029. The Licensee shall:

- provide qualifying outdoor mobile broadband coverage to not less than forty percent (40%) of the Rural Population; and
- cover all major road corridors connecting the sixteen regional capitals (Section 2.9.3(2)), as those corridors are identified in the response to Question 52.

By 1 December 2032. The Licensee shall:

- provide qualifying outdoor mobile broadband coverage to not less than sixty percent (60%) of the Rural Population; and

- cover all towns and villages with a population of five thousand (5,000) or more (Section 2.9.3(4)).

By 1 December 2035. The Licensee shall:

- provide qualifying outdoor mobile broadband coverage to not less than eighty percent (80%) of the Rural Population; and
- provide, in each region, population coverage of not less than the greater of (a) seventy percent (70%) of the population of that region and (b) the Licensee's national population coverage less fifteen (15) percentage points.

Where an obligation under Section 2.9.1, 2.9.2 or 2.9.4 addresses the same coverage, locality or performance parameter as an obligation stated above, the more stringent requirement applies.

These obligations are technology-neutral and may be satisfied using any combination of spectrum lawfully held by the Licensee, provided the applicable qualifying-coverage and user-experienced performance requirements are met. They do not require the use of spectrum assigned under this RFA, except to the extent separately required by the band-differentiated obligations stated in the response to Question 48. The Rural Population against which the milestones are assessed is determined in accordance with the responses to Questions 51 and 53.

These obligations are separate from the band-differentiated obligations applicable to the spectrum assigned under this RFA, which are dealt with at Question 48 and which require the spectrum assigned under this RFA itself to be brought into service in accordance with the timelines stated there. Those obligations attach to the assigned spectrum; the obligations in Section 2.9.3 do not.

Nothing in this amendment relieves a Licensee of any coverage obligation or intermediate milestone independently applicable under an existing licence or other regulatory instrument. Such obligations continue to apply according to their terms.

Question 50 — Application of the 'No Region Left Behind' principle to the coverage objectives in Section 2.9.3

Response. The 'No Region Left Behind' principle is an objective of Government policy on digital development. It does not create a rural population coverage percentage additional to the milestones in Section 2.9.3. It operates as a constraint on the geographic distribution of the SMP Licensee's rollout: the rural population coverage milestones may not be attained by concentrating deployment in the most commercially attractive regions while leaving other regions substantively unaddressed.

The principle is given quantitative effect at the mature 1 December 2035 milestone through the regional coverage requirement in Section 2.9.3, as stated in the response to Question 49.

In practical terms the principle has the following effects. The Network Design and Rollout Implementation Plan submitted under Section 2.9.5.1(2) must present expected coverage and capacity for every one of the sixteen regions, and not for a selection of them. Each of the sixteen regional capitals must be covered. The corridors identified under Section 2.9.3(2) connect the regional capitals and are to be covered as stated in the response to Question 52. And in assessing a Plan on a pass/fail basis under Section 3.3.2A, the Authority will have regard to the distribution of the proposed deployment across the sixteen regions. That distribution is not a separate pass/fail test additional to the requirements of Section 3.3.2A; it is an element of the assessment of whether the rollout described is viable and attainable and consistent with the obligations in

Section 2.9.3. A Plan that does not present expected coverage and capacity for a region as Section 2.9.5.1(2) requires, or whose proposed distribution of deployment across the regions is materially inconsistent with the coverage obligations in Sections 2.9.1 to 2.9.3, may fail to demonstrate a viable and attainable rollout for the purposes of Section 3.3.2A.

Compliance with the thresholds in Section 2.9.3 continues to be measured nationally against the reference dataset described in the response to Question 51.

For an Applicant already operating a licensed mobile network, existing qualifying coverage may be relied upon in demonstrating compliance with the milestones in Section 2.9.3. The Network Design and Rollout Implementation Plan shall identify the existing qualifying coverage relied upon and the incremental deployment proposed to attain the applicable outstanding milestones.

Question 51 — Clarity on the areas classified as rural

Response. 'Rural Population' is defined in Section 2.9.3 by reference to the localities classified as rural by the Ghana Statistical Service in the 2021 Population and Housing Census, fixed as at the effective date of the licence. That classification governs, and the Authority will make the fixed reference dataset available so that compliance is assessed against a single, auditable denominator. The same fixed Rural Population baseline shall be used for assessing the forty percent (40%), sixty percent (60%) and eighty percent (80%) milestones in Section 2.9.3. The reference in Section 2.9.3(4) to towns and villages of 5,000 or more is a separate coverage trigger and does not define 'rural'.

Question 52 — Clarity on the specific roads under 'major road corridors connecting regional capitals'

Response. Section 2.9.3(2) is corrected by the deletion of the words "and rail", so that the obligation is to cover all major road corridors connecting regional capitals. No rail corridor obligation is imposed under this RFA, and references to rail corridors in the RFA are to be disregarded. The correction is made because the rail network in Ghana is not developed to an extent that would make such an obligation meaningful. The corridors in Section 2.9.3(2) are accordingly the major road corridors: the highways linking the sixteen regional capitals to one another. For the purposes of Section 2.9.3(2), "all major road corridors connecting regional capitals" means all highways linking the sixteen regional capitals to one another. Coverage along those corridors must meet the Authority's prevailing quality-of-service standards. The date by which the corridors are to be covered is stated in the response to Question 49.

Question 53 — GIFEC and universal-access sites: how existing coverage in those areas interacts with the SMP rural obligation

Response. A distinction must be drawn between two kinds of site. The first is a Rural Telephony Project site: an active site over which mobile coverage is presently provided in a locality that commercial rollout has not reached. The second is a GIFEC shared infrastructure site: infrastructure provided for the use of operators, which Licensees are expected to use in extending their own coverage.

Rural Telephony Project sites are excluded. Section 2.9.3 is amended by the modification of the Rural Population denominator: for the purposes of the rural coverage obligations in that Section, the population of localities served by active Rural Telephony Project sites, including those deployed under the 2016 site programme, is excluded from the population base against which those obligations are assessed. The exclusion operates by reference to the localities served by active Rural Telephony Project sites as at the effective date of the licence. The Authority does not publish a schedule of those localities for the purposes of this process, and an Applicant is not required to identify them in order to prepare its application. The exclusion can only reduce the population base against which the rural coverage obligations are assessed, and never increase it. An Applicant may therefore model and price its rollout against the Rural Population as classified by the Ghana Statistical Service in the 2021 Population and Housing Census, without adjustment, and will not be prejudiced by doing so. The Authority will identify the excluded localities to each Licensee, and the localities so identified will be used in assessing compliance. The adjusted Rural Population denominator determined in accordance with this response shall be the denominator used for each of the forty percent (40%), sixty percent (60%) and eighty percent (80%) milestones in Section 2.9.3.

GIFEC shared infrastructure sites are not the subject of any exclusion. They are a resource available to Licensees, and coverage a Licensee provides using such infrastructure is its own qualifying coverage in the ordinary way, subject to the response to Question 55.

The exclusion of Rural Telephony Project localities is made because they are served from public universal access funding, and the obligation in Section 2.9.3 is directed to the extension of coverage to populations not otherwise served. It would not be consistent with that purpose for the obligation to be assessed against, or discharged by reference to, localities already provided for under that programme. The exclusion does not signify that deployment by a Licensee in those localities is unwelcome. The contrary is the case, and the Authority's position is set out in the response to Question 54.

The requirements applicable to an individual excluded location may be discussed between the Authority and a Licensee on a case-by-case basis, whether because the Licensee proposes to extend its own coverage to that location, or because the Licensee's deployment plan or the circumstances of the location otherwise make it appropriate. Any such arrangement is a matter for agreement between the Authority and the Licensee concerned, and does not alter the obligations in Section 2.9.3.

For the avoidance of doubt, the Licensee's separate statutory contribution to the Ghana Investment Fund for Electronic Communications under Section 2.8.5 does not discharge, reduce or substitute for the coverage obligations, and coverage relied on for compliance elsewhere must be attributable to the Licensee's own qualifying service.

Question 54 — Rural Telephony Project coverage areas: whether deployment within those areas is required, and whether obligations may be met by roaming there

Response. The Authority encourages deployment by Licensees within Rural Telephony Project coverage areas. The Rural Telephony Project, and the wider universal access programme, exist because commercial rollout has not reached the localities concerned. A universal access site is a remedy for the absence of commercial coverage; it is not a permanent allocation of public infrastructure to a locality. Where a Licensee extends its own commercial coverage to such a locality, the Authority's policy is that the universal access site serving it should be relocated by the Ghana Investment Fund for Electronic Communications to a locality that remains unserved. Deployment by a Licensee in these areas therefore advances the universal access programme rather than undermining it, and releases public infrastructure to where it is needed.

It follows that the attainment of obligations by means of national roaming in these areas is not the outcome the Authority seeks. Roaming leaves the universal access site committed to a locality that no longer requires it. The position stated in the response to Question 43 applies in any event: coverage obtained passively as a roaming customer on another operator's network does not discharge a Licensee's own coverage obligations.

Deployment in these localities is encouraged; it is not compelled. As stated in the response to Question 53, localities served by active Rural Telephony Project sites are excluded from the population base against which the rural coverage obligations in Section 2.9.3 are assessed, and a Licensee is not in breach of Section 2.9.3 by reason only of not having deployed in one of them. A Licensee proposing to extend coverage to one or more of those localities should raise the matter with the Authority, which will coordinate with the Ghana Investment Fund for Electronic Communications so that relocation of the site concerned follows in an orderly way and with due regard to continuity of service for the users then being served. The Authority will deal with such proposals as they arise.

Question 55 — Whether coverage delivered through infrastructure or network sharing counts toward obligated coverage

Response. Qualifying coverage that a Licensee provides through an approved infrastructure- or network-sharing arrangement (Section 2.9.5.1(3)) counts toward its coverage obligations, provided the Licensee's own spectrum forms part of the deployment providing that coverage, the coverage meets the standard in Sections 2.9.1 and 2.9.4, and the arrangement has the Authority's approval where required. The Licensee remains individually responsible for its obligations; coverage obtained passively as a roaming customer on another operator's network does not, of itself, discharge the Licensee's own coverage obligations. The Authority will assess coverage credit on the substance of the arrangement.

Question 56 — Deployment relying on third-party infrastructure, and the evidence required at application stage

Response. A deployment strategy that relies substantially on passive infrastructure obtained from third parties — sites and towers provided by independent tower companies, and transmission capacity provided by third-party fibre operators — is not precluded, and is contemplated by Section 2.9.5.1(3). Coverage that the Licensee provides over its own radio access network, deployed on infrastructure obtained from a third party, is the Licensee's own qualifying coverage and counts toward its obligations, provided it meets the standard in Sections 2.9.1 and 2.9.4. Coverage obtained passively as a roaming customer on another operator's network does not (see the responses to Questions 43 and 55). Active sharing arrangements, including MORAN and MOCN configurations, are addressed at Question 40 and require the Authority's prior approval.

As to evidence, the RFA does not prescribe a required form of instrument, and the Authority does not pre-certify any single document as sufficient in isolation. The Network Design and Rollout Implementation Plan is assessed on a pass/fail basis under Section 3.3.2A by reference to whether the rollout it describes is viable and attainable. Where the plan depends materially on infrastructure to be obtained from third parties, the evidence should be commensurate with that dependence.

As a general guide, and without fettering the Authority's assessment on the facts of each application: executed and legally binding commercial agreements carry the greatest evidential weight; heads of terms, memoranda of understanding and letters of intent are capable of contributing to a satisfactory demonstration, and will be weighed according to how firm, unconditional and specific they are as to sites, capacity, timing and price, and according to their consistency with the cell counts, site typology and milestones set out in the Plan under Section 2.9.5.1(2). A general expression of willingness to do business, unrelated to the volumes and timescales the Plan assumes, carries correspondingly little weight. Applicants are encouraged to submit the strongest available combination rather than to rely on any single document. The single clarification-and-cure opportunity in Section 3.3.2B is available.

Question 57 — Whether the national population coverage date will be extended

Response. The date in Section 2.9.1 is fixed. It is not an indicative date, and the Authority does not propose to alter it. It is set by reference to a national milestone, and the obligation it carries is a material condition of the licence.

The Authority has carefully considered the concerns raised as to the attainability of seventy percent national population coverage by 6 March 2027, and as to the capital expenditure, equipment lead times and spectrum considerations involved. Having considered them, the Authority has determined that the requirement shall remain unchanged. The date is set by reference to a national milestone and is not adjusted for individual Applicants: to carry it in the licence of one Successful Applicant and not in that of another would alter the basis on which Applicants competed.

In assessing an application the Authority will evaluate the network design submitted, the spectrum considerations applicable to the lots for which the Applicant applies, and the demonstrated capability of the Applicant to attain the obligation. That evaluation goes to whether the rollout proposed is viable and attainable for the purposes of Technical Qualification; it is not an occasion for the obligation itself to be varied. As with every obligation under the licence, the Authority monitors and enforces compliance under Section 2.11, exercising its enforcement discretion proportionately and having regard to the circumstances of any shortfall, as explained in the response to Question 10.

In that connection the Authority confirms that the obligation in Section 2.9.1 is to provide outdoor mobile broadband coverage to at least seventy percent of the total population, and that it is band- and technology-neutral. It is not an obligation to deploy 5G to that threshold, and it may be met using any combination of the spectrum the Licensee holds and any compliant radio access technology that delivers the required performance: see the responses to Questions 47 and 49. For an Applicant with an existing network, the obligation is accordingly capable of being met in substantial part from its existing deployment. The mandatory 5G-specific coverage obligations at Question 48 are separate from and additional to it, and are not affected by this response.

Applicants should prepare and price their applications on the basis of the date as published.

ANNEX A — REVISED TABLE 7 (SECTION 3.5): ADJUSTED TIMETABLE

Table 7 of the RFA as published is reproduced below in full, item for item, with the revised date for each item. The deadline for the submission of applications, and each date falling after it, is adjusted by twenty-one (21) calendar days. In addition, and separately from that adjustment, the period for the payment of Licence Fees and the issue of licences is extended from thirty (30) days to sixty (60) days, in line with the Authority's standard period, so that the revised date at item 12 is sixty (60) days from the revised date at item 11 and not twenty-one (21) days from the published date. Published item 12 combined the payment of Licence Fees with the issue of licences; those are separated below into items 12 and 13. Payment in full is a condition precedent to issue, and the Licence issues within ten (10) Business Days after confirmed receipt, subject to satisfaction of all other applicable conditions. Dates already elapsed are unchanged. Where a revised date falls on a day that is not a Business Day, the next following Business Day applies. The durations stated in Table 7 are otherwise unchanged.

No.	Item (as published)	Published date (V1.0, 16 July 2026)	Revised date
1	Issue of this Request for Applications	Thu 16 July 2026	**Unchanged (elapsed)**
2	Pre-application briefing for prospective Applicants	Mon 27 July 2026	**Unchanged (elapsed)**
3	Deadline for written queries from prospective Applicants	Tue 28 July 2026, by 5:00 pm	**Unchanged (elapsed)**
4	Authority's consolidated response to queries	Thu 30 July 2026	**Fri 31 July 2026**
5	Submission of applications (deadline)	Thu 6 August 2026, by 5:00 pm	**Thu 27 August 2026, by 5:00 pm**
6	Opening of Envelope A (Administrative and Technical Submissions); applications recorded and secured, no evaluation on opening day	Thu 6 August 2026, from 5:30 pm	**Thu 27 August 2026, from 5:30 pm**
7	Eligibility review and technical qualification assessment (including any clarification or cure under Section 3.3.2B)	Fri 7 - Tue 18 August 2026	**Fri 28 August - Tue 8 September 2026**
8	Publication of list of Qualified Applicants	Wed 19 August 2026	**Wed 9 September 2026**
9	Opening and ranking of Best Price Offers (Envelope B)	Thu 20 August 2026	**Thu 10 September 2026**
10	Second-round bidding, where oversubscribed, or confirmation at MRP and re-opening, where undersubscribed (as applicable, per band) (Section 3.3.4)	Fri 21 - Thu 27 August 2026	**Fri 11 - Thu 17 September 2026**
11	Notification of Successful Applicants (subject to any tie-break process under Section 3.3.5)	Fri 28 August 2026	**Fri 18 September 2026**
12	Payment of Licence Fees	Within 30 days; by Mon 28 Sep 2026	**Within sixty (60) days of notification of award - by Tue 17 Nov 2026**

13	Issue of Licences	Combined with payment at item 12	**Within ten (10) Business Days after confirmed receipt of the full Licence Fee**