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الـهيئـــة الـوطنيـــة للإتـصـــالات
National Communications Authority

Ex-Post Review Report

Unified Licensing Framework (ULF)

Review Period: December 2020 – December 2024

Executive Summary

In November 2020, Somalia's National Communications Authority (NCA) adopted the Unified Licensing Framework (ULF), replacing the licensing system previously managed by the Ministry of Posts and Telecommunications Technology. Based on the 2017 National Communications Law, the ULF established three main licensing categories: Communications Infrastructure Provider (CIP), Applications and Services Provider (ASP), and a combined Communications Infrastructure and Services Provider (CISP). It also introduced a class licensing tier for terminal equipment, VSAT, and one-time permits.

This ex-post review, conducted by the NCA Licensing and Compliance Department, assesses the ULF's performance over its first four years (December 2020 to December 2024). It concludes that the framework has generally met its core goals of technological and service neutrality, administrative simplicity, and easing market entry. By the end of the review period, 47 operators had been licensed, consistent with the initial baseline at adoption. The licensing process is particularly efficient, with an average turnaround time of seven days. Nonetheless, the review highlights areas needing improvement, especially compliance gaps among some licensees.

Key findings are summarised below:

- Total licensed operators under the ULF: 47, distributed across CISP (9 MNOs), ASP (7), Regional CIP (4), MVNO (3 authorized), International CIP (1 licensed), Class B Terminal Equipment (6), and Dot SO Domain Registrar (17).
- License processing efficiency is high, with an average turnaround of 7 days and 70 applications processed since adoption, of which only 2 were rejected.
- Compliance remains uneven: one operator holds conditional status due to pending compliance, two entities are operating without valid licenses (Somcable and Soltelco), and 12 formal warnings have been issued across the sector.
- The framework needs to be updated to address emerging services, including Over-the-Top (OTT) platforms, Internet of Things (IoT), and LEO satellite broadband.

Overall assessment. The ULF has proven to be a sound regulatory instrument. It has simplified market entry, supported convergence, and given operators the flexibility to deploy a range of technologies and services under a single license. These outcomes confirm the policy choice made in 2020 to move away from service- and technology-specific licensing toward a unified, technology-neutral model.

Priorities for improvement. The review identifies three priorities for the next phase of implementation. First, compliance enforcement must be strengthened to address the cases of unlicensed operation and conditional licensing identified in the registry. Second, the framework requires technical updates to extend coverage to next-generation services such as 5G, the Internet of Things, Over-the-Top (OTT) platforms, and Low Earth Orbit (LEO) satellite broadband, which are not adequately addressed under the existing categories. Third, monitoring and reporting mechanisms should be formalized to ensure continuous oversight of the licensed operator base and to provide the evidence base for future regulatory adjustments.

Way forward. The detailed conclusions and recommendations set out in Part VI build on these findings and propose a phased pathway to update the ULF, accompanied by complementary enforcement and stakeholder engagement measures. Acting on them will help ensure that Somalia’s licensing regime continues to serve the public interest, support sustainable sectoral growth, and remain aligned with international good practice as the communications market evolves.

Part I: Background and Review Methodology

1.1 Purpose and Scope of the Review

This report presents the findings of the ex-post review of Somalia's Unified Licensing Framework, adopted by the National Communications Authority in November 2020. The review covers the period from December 2020 to December 2024 and encompasses all individual and class license categories established under the ULF. Its purpose is to assess whether the framework has achieved its stated objectives, identify implementation gaps, and provide evidence-based recommendations for regulatory improvement.

Specifically, the review seeks to: (i) examine the performance of the ULF against its original objectives of technology and service neutrality, convergence, administrative simplicity, and market-entry facilitation; (ii) document the size, composition, and compliance status of the licensed operator base; (iii) identify operational, structural, and emerging-technology gaps in the framework; and (iv) propose targeted recommendations to inform any future revision of the ULF and the associated licensing instruments. The scope is limited to licensing matters and does not extend to spectrum management, numbering, interconnection pricing, or universal-service mechanisms, which are addressed under separate regulatory instruments issued by the Authority.

1.2 Legal and Regulatory Basis

The ULF derives its authority from the National Communications Law of October 2017. Articles 3(1) and 41(1) vest the NCA with powers to issue licenses for the provision and operation of communications infrastructure and services within Somalia. Article 2(2a) explicitly articulates the facilitation and unification of communications services as a primary objective of the Law, thereby providing the legislative mandate for adopting a unified approach to licensing.

In addition to the National Communications Law, the ULF is operationalized through subsidiary instruments issued by the NCA, including the license categories and conditions published with the framework in November 2020, the prevailing fee schedules, and the Authority's compliance and enforcement procedures. Together, these instruments give effect to the principle of technology and service neutrality embedded in the Law and define the rights and obligations of licensees. The framework therefore sits within a coherent statutory and regulatory architecture, with the NCA acting as the sole licensing authority for the communications sector in Somalia.

1.3 Review Methodology

The review was conducted by the NCA Licensing and Compliance Department using the following methods:

- Review of the NCA operational license registry and compliance records.
- Analysis of license application, issuance, and enforcement data for the period 2020–2024.
- Assessment of the ULF structure against its stated objectives using qualitative performance indicators.
- Benchmarking against comparable licensing frameworks in the East African region.

The findings presented in this report are drawn from primary records held by the NCA and, where appropriate, supplemented by publicly available information on regional licensing regimes. The analysis is qualitative in nature and reflects the state of the licensed operator base as at the close of the review period. Two limitations should be noted: first, certain operator-level performance indicators (such as subscriber numbers, traffic volumes, and revenue) fell outside the scope of this licensing-focused review; and second, the review captures the position at a fixed point in time, recognizing that the licensed operator base and the broader market continue to evolve.

Part II: Assessment of ULF Objectives

2.1 Efficiency of Convergence

The ULF was created to enable various services to be provided over a single network or platform, promoting economies of scope and more efficient use of infrastructure. The review confirms this goal has been largely met. Currently, nine operators—all holding the combined CISP license—offer multiple services, including voice, data, mobile money, and internet access, through integrated networks. This consolidation marks a significant shift away from the old system, in which operators were limited by licenses tied to specific technologies and services.

The CISP license has become the dominant license category among Mobile Network Operators, enabling them to operate both infrastructure and services under a single regulatory instrument. This has reduced administrative duplication and encouraged network sharing and multi-service delivery, consistent with the convergence objective.

2.2 Technology Neutrality

The framework's technology-neutral design has allowed licensed operators to deploy across multiple generations of mobile technology (2G, 3G, and 4G) as well as fixed, fiber optic, and satellite infrastructure — all under a single class of license. The review confirms that operators have exercised this flexibility, with the market reflecting a diverse mix of technologies across infrastructure categories. No evidence was found of the framework imposing technology-specific constraints on operators.

However, the framework's neutrality has not yet been extended to accommodate next-generation technologies, including the Earth Orbit (LEO) satellite broadband systems, both of which are commercially active in comparable markets, and remain unaddressed by the current ULF, representing a forward-looking gap.

2.3 Service Neutrality

The review finds that the ULF has delivered effective service neutrality. In particular, the ASP license permits licensees to offer any combination of voice, data, internet, IPTV, mobile money, and value-added services without service-specific restrictions. Interoperability is supported by interconnection agreements among operators, which facilitate the use of common standards and protocols across networks.

No evidence was found that the framework conferred undue preference on any particular service type during the review period. The presence of both wholesale and retail service provisions across the ASP and CIP categories further supports a neutral and competitive service environment.

2.4 Consumer Choice

The ULF's market-entry facilitation objective is reflected in a sector comprising 47 licensed operators across diverse categories, serving consumers across voice, data, internet, and digital services. The presence of seven ASP licensees providing internet and data services, three MVNO licensees offering mobile services without owning infrastructure, and 17 Dot SO domain registrars providing digital identity services indicates a broadening of the service provider landscape since the framework's adoption.

Part III: Assessment of License Categories

3.1 Overview of Licensed Operators

As at the close of the review period (December 2024), the NCA registry records the following distribution of licensed operators under the ULF:

License Category	License Type	No. Licensed	Non-Compliant / Unlicensed
Individual — CISP	Communications Infrastructure & Services Provider (MNO)	9	2 (conditional)
Individual — ASP	Applications and Services Provider	7	—
Individual — Regional CIP	Regional Communications Infrastructure Provider	4	—
Individual — MVNO	Mobile Virtual Network Operator	2	1 unlicensed
Individual — National CIP	National CIP License	0	—
Class — Terminal Equipment (Class B)	Distribution, Installation & Maintenance	6	—
Class — Dot SO Domain Registrar	One-Time Authorization / Dot SO	17	—
TOTAL	**All Categories**	**45**	3

3.2 Communications Infrastructure and Services Provider (CISP) Licenses

The CISP license has been the primary licensing instrument for Somalia's Mobile Network Operators, with 9 operators holding it at the end of the review period. These include Amtel Somalia, Golis Telecom Somalia, Hormuud Telecom Somalia, Nationlink Telecom, Somlink, Somtel Somalia, Somtel Ltd, Somtel Telecommunications Company, and Telesom Company.

Of the nine operators, Hormuud Telecom Somalia is the only one recorded as fully compliant. Seven operators are working to meet compliance requirements, while Nationlink Telecom holds a conditional license and is recorded as non-compliant. Somlink is also conditionally licensed, with compliance proceedings ongoing. The high proportion of operators in an incomplete compliance status warrants closer monitoring and targeted enforcement by the NCA.

3.3 International CIP Licenses

Two entities operate within the International CIP category. Dalkom Somalia holds a valid International CIP license and is recorded as compliant, providing international gateway and connectivity services, including submarine cable access. Somcable, however, is recorded as operating without a valid license — a significant compliance concern given the critical nature of international infrastructure for national connectivity.

3.4 National CIP Licenses

No National CIP licenses were issued during the review period, highlighting a significant gap. This category aims to facilitate the nationwide deployment of public fixed and land-mobile cellular systems. The lack of licensees at this level might be due to market preferences for the broader CISP license,

which includes both infrastructure and services, or to structural or financial barriers to entry. Further investigation by the NCA is recommended.

3.5 Regional CIP Licenses

Four Regional CIP licenses have been granted to Netlink Somalia, Speedlink, Starnet Telecom, and Astaan Limited—each of which has been licensed and documented as compliant. This category has operated as expected, facilitating infrastructure deployment at local and city levels and expanding connectivity to communities beyond the reach of major national operators.

3.6 Applications and Services Provider (ASP) Licenses

Seven ASP licenses have been issued to internet service providers and data service operators, including Somcast Network Limited, Bluecom, Somali Optical Network, Infomage Solutions Ltd, Safari Link ISP, Damal Internet and ICT Providers, and One Click Internet Provider. All seven licenses are valid, and most are compliant. The ASP tier successfully serves as the main gateway for internet and data services in Somalia.

3.7 Mobile Virtual Network Operator (MVNO) Licenses

Three MVNO licenses have been issued: Durdur Telecom and Somnet Telecom hold valid, compliant licenses, while Soltelco is recorded as unlicensed. The MVNO framework is a positive structural feature of the ULF, as it enables market competition without requiring capital-intensive infrastructure investment. However, Soltelco has started the licensing process but has yet to complete it, resulting in its unlicensed status.

3.8 Class Licenses

Six licenses have been issued for Class B Terminal Equipment Distribution, Installation, and Maintenance. The Dot SO Domain Name Registrar category has seen the widest participation, with 17 licensees—16 registrars along with the Somali Network Information Centre (SONIC) serving as the registry operator. All Dot SO licensees are noted as compliant, demonstrating effective administration of this category. Currently, there are no recorded Class A Terminal Equipment licenses in the registry.

Part IV: Implementation and Compliance Assessment

4.1 Licensing Process Efficiency

The NCA's licensing process has proven to be notably efficient under the ULF. The average of 7 days to issue a license indicates a smoothly managed administrative system, aligning with the ULF's goal of reducing regulatory hurdles and costs. Since the policy's introduction, the NCA has received 50 license applications, with 46 approvals. This high approval rate implies that the licensing requirements are clearly communicated and well understood by applicants.

4.2 Compliance and Enforcement

During the review period, 12 formal warnings were issued to operators, and one license has been revoked since the policy's implementation. Additionally, two unlicensed operators were identified: Somcable, which runs international communications infrastructure without a valid CIP license; Soltelco, providing mobile virtual network services without a valid MVNO license despite initiating the licensing process; and operating unlicensed entities, particularly in critical infrastructure sectors, pose regulatory, security, and consumer protection risks that require prompt enforcement actions.

Enforcement Indicator	Recorded Outcome
Total license applications received (2020–2024)	50
Applications rejected	2
Average license issuance time	7 days
Formal warnings issued	12
Licenses revoked	1
Unlicensed operators detected	2

Part V: Identified Gaps and Challenges

5.1 Emerging Technologies Not Covered by the ULF

The key structural gap found in this review is the framework's failure to address rapidly evolving technology and service categories. Notably, the ULF currently does not include the following segments:

- Low-Earth Orbit (LEO) satellite broadband services, such as those provided by Starlink, are expanding into markets across Africa. These services represent a fundamentally different delivery model that is not currently included under the existing CIP or ASP classifications.
- The growth of Internet of Things (IoT) and Machine-to-Machine (M2M) services in agriculture, maritime, health, and logistics sectors demands specific regulatory provisions to address the increasing number of connected devices.

It is recommended that a targeted review of the ULF be initiated to develop licensing provisions and regulatory guidelines for each segment.

5.2 Compliance Gaps and Unlicensed Operations

The prevalence of operators in non-compliant or conditional-license status, combined with confirmed unlicensed operations by Somcable and Soltelco, indicates that the enforcement framework needs strengthening. Develop a structured compliance monitoring program with defined timelines, escalation steps, and proportionate sanctions to address both persistent noncompliance and unlicensed operations.

5.3 Absence of National CIP Licensees

The National CIP license category, designed for operators deploying public fixed and mobile cellular systems nationwide, has not attracted any licensees during the review period. This could suggest that the CISP license is fulfilling demand that might otherwise go to the National CIP or that the fee structure, terms, and conditions of this category are not appealing from a commercial perspective. The NCA should perform a focused analysis to understand this gap.

Part VI: Conclusions and Recommendations

6.1 Overall Conclusions

The Unified Licensing Framework has broadly delivered on its foundational objectives over the first four years of implementation. The framework has simplified the licensing process, introduced technology and service neutrality, and provided a platform for a diverse operator ecosystem. The licensing administration is efficient, with a seven-day average turnaround and a very low rejection rate. The CISP category has been particularly successful in supporting convergent service delivery by Mobile Network Operators, and the Dot SO domain registry has flourished with strong compliance.

However, the review finds that several structural and regulatory gaps require attention to ensure the framework remains fit for purpose in a rapidly evolving technology landscape. If unaddressed, these gaps risk undermining the competitive and investment climate the ULF was designed to create.

6.2 Recommendations

Short-Term Recommendations (0–3 Months)

- Begin formal enforcement actions against noncompliant operators and publish the results to discourage similar behavior.
- Establish a compliance deadline and an escalation framework for all operators currently in 'in-process' or 'conditional compliance' status, with defined sanctions for noncompliance.

Medium-Term Recommendations (1–6 Months)

- Initiate a targeted review of the ULF to develop regulatory provisions for LEO satellite services, OTT platforms, and IoT/M2M services.
- Investigate the lack of National CIP licensees and consider revising the terms, conditions, or fee structure for this category to stimulate market interest.
- Explore mandatory MVNO access obligations for host MNOs to lower barriers to MVNO market entry and enhance competition in the mobile market.

Long-Term Recommendations (1–12 Months)

- Develop a comprehensive digital services licensing framework to complement the ULF, covering emerging service categories that do not neatly fit the current infrastructure/services binary.
- Engage with Federal Member State authorities to develop a formal framework for regulatory coordination across jurisdictions, reducing the risk of overlapping or conflicting regulatory action.

Annex: Licensed Operators Registry — As at December 2024

A.1 Communications Infrastructure and Services Providers (CISP) — Mobile Network Operators

No.	Operator Name	Status	Compliance
1	Amtel Somalia	Licensed	In-Process
2	Golis Telecom Somalia	Licensed	In-Process
3	Hormuud Telecom Somalia	Licensed	Compliant
4	Nationlink Telecom	Licensed (Conditional)	Non-Compliant
5	Somlink	Licensed (Conditional)	In-Process
6	Somtel Somalia	Licensed	In-Process
7	Somtel Ltd	Licensed	In-Process
8	Somtel Telecommunications Company	Licensed	In-Process
9	Telesom Company	Licensed	In-Process

A.2 Mobile Virtual Network Operators (MVNO)

No.	Operator Name	Status	Compliance
1	Durdur Telecom	Licensed	Compliant
2	Somnet Telecom	Licensed	Compliant
3	Soltelco	Unlicensed	N/A

A.3 International Communications Infrastructure Providers (CIP)

No.	Operator Name	Status	Compliance
1	Dalkom Somalia	Licensed	Compliant
2	Somcable	Unlicensed	Non-Compliant

A.4 Regional Communications Infrastructure Providers

No.	Operator Name	Status	Compliance
1	Netlink Somalia	Licensed	Compliant
2	Speedlink	Licensed	Compliant
3	Starnet Telecom	Licensed	Compliant
4	Astaan Limited	Licensed	Compliant

A.5 Applications and Services Providers (ASP)

No.	Operator Name	Status	Compliance
1	Somcast Network Limited	Licensed	Compliant
2	Bluecom	Licensed	Compliant
3	Somali Optical Network	Licensed	Compliant
4	Infomage Solutions Ltd	Licensed	Compliant
5	Safari Link ISP	Licensed	Compliant
6	Damal Internet and ICT Providers	Licensed	Compliant
7	One Click Internet Provider	Licensed	Compliant

A.6 Class B — Terminal Equipment Distribution, Installation and Maintenance

No.	Operator Name
1	Talo Consulting
2	Gawle Air Cargo LLC
3	VIVACOM
4	Al Madina Development and Supply LLC
5	BCE Systems
6	Somspace Information Communications and Technology Ltd

A.7 Dot SO Domain Name Registrar Service Providers

Seventeen Dot SO licensees are recorded in the registry, all with valid licenses and compliant status. These include Tabaarak ICT Solution, SOSTEC, Daa'uus, Suubbis Ltd, Modern Technology, Yooltech, Aleelo Tech, Raed Innovation and Technology Ltd, Maanshiil Ltd, Swift Comma, Horsan Corporation Ltd, Kaafiye Technology Center, Key Message LLC, Recent IT, TechZone Business Solution, Center for Media and Technology (CMT), and the Somali Network Information Centre (SONIC) as the Dot SO Registry Operator.