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Honorary Chair of the IEEE Computer Society in
South Africa
30 January 2015

Dr Siyabonga Cwele, MP

Re: **ICT Policy Review: Discussion Paper**

Dear Dr Cwele,
Thank you for the opportunity to respond to the ICT policy discussion paper.

It is virtually impossible to give a response to all the issues considered in the document. This is a fundamental criticism and is not merely a logistic issue.

By way of example, I consider 4 issues that relate to the context in which this policy discussion is phrased:

(1) The term "ICT" seeks to link IT, Communications and Broadcasting through convergence. While this is a valid technical direction, it is completely at odds with the dynamics of the business of these independent sectors. There is a need to align policy - but this should also be done with the DTI, DST and so on, rather than at the level of granularity considered in "ICT" convergence.

(2) The ITU should not be the only international body to draw upon in terms of Standards and Policy. While the IEEE does provide one of the many alternatives in policy formulation and standards, it would be far more useful to create an enabling environment in South Africa to determine policy and appropriate standards, rather than deferring to organisations such as the ITU (or any other).

(3) Looking at the list of contributors, there appears to be a dearth of independent companies, technical companies and small companies engaged in the process. On the other hand there is a preponderance of lawyers and telcos. I would argue that this policy is missing Internet of Things, MOOKs and the licensing of software, especially international vendors providing to government.

(4) This attempt to create a policy framework is far too ambitious and controlling to work. Policy from nominally this department is normally years too late. While we understand it is the responsibility of government to represent appropriate stakeholders, as things stand this policy discussion is not a proactive force to create value and free up companies to innovate and build. It seems that this policy seeks to play catch-up. I would argue that it should seek to get ahead to provide an enabling environment. Another example is POPI, which has been promulgated, but has no enforcement structure.

Each of the above issues is a cause for serious concern. Korwe Software is a voting member on international standards committees; we have arranged at least 4 national colloquia on Software Engineering and consider ourselves a leading innovative local company. Yet there tranches of the policy with which we would take issue. While we

have now been afforded the opportunity to present our views, having a consistent and continuous process would be more useful.

My views above could be summarised concisely thus: while there are representative bodies and companies wishing to communicate their needs and requirements as well as shouldering the load, we are generally disregarded. Government attempts to address the real needs of South African companies is not convincing at all. By way of example, the AAIICT was a worthy initiative that got diluted, subverted and finally quietly dropped. However, industry observers do not lightly forget. Another policy that has been all but abandoned is the government use of Open Source (which, incidentally is questionable.)

In the following, I have chosen to engage a few of issues on the basis that I know little about them. However, the fact that I have not chose to engage others is not that I do not recognise their importance, nor suffer from bad decisions ("Net Neutrality" would be a case in point.)

3.8.3 **"Are there any issues that you believe have been neglected?"** I think that there are potentially many omissions. But I do not think that it is useful to try and catch everything in one net. I think that a policy framework should be technology agnostic, and not seek to catch every fish that slips out. It should also be goal orientated towards identified outcomes for specific segments of society.

3.8.3 **"Can you suggest any benchmarks and targets which may be incorporated to monitor progress against policies objectives?"** There are many benchmarks. Some are better than others. However it is the opinion of many observers, including this author, that South Africa is slipping down the rankings such as in the *2014 Measuring the Information Society (MIS) Report:* "89 in 2012 to 90 in 2013". One could argue the merits of various indexes, but what is needed is a national agreement on which metrics we seek to pursue. What is more alarming is that we are not keeping apace with our competitors: "South African … falls just below the global average."

4.4 **"What areas should an e-government strategy focus on?"** Government needs to make use of local suppliers. Further, Government needs to radically reconsider the policy of tenders.
"What norms and standards need to be updated and what additional standards developed?" Organisations such as the IEEE can help develop standards with regard to IT services. We as the IEEE ZA have engaged the Bangalore Section of the IEEE around Open Data.
"What role should SITA play?" SITA has not been effective for many years.
"How could GITOC be strengthened?" I have never seen any coordination of IT policy by this body. In fact, South Africa is Co-Chair of the global Open Government Partnership, however local councils are blissfully unaware of this (and the South African chair disregards my email.)

4.4.2 **"Is there a need for a specific national open data policy?"** Yes. **"If so, what do you propose should be included in such a policy?"** Please consider http:// sunlightfoundation.com/opendataguidelines/
"How can government ensure that policies relating to open data are implemented across all government and public entities and spheres?" This would involve creating an open environment, where stakeholders are engaged openly. However, such

a policy should be financially self-sustaining, and we would encourage a similar process to that used to develop the ETSI standards.

Conclusion:
This paper is a comprehensive and welcome discussion document. It absolutely must be implemented. However, I despair whether this will ever be the case.

I am responding as MD of Korwe Software. However, as chair of the IEEE Computer Society in South Africa, I do wish to draw attention to the fact that our members could well make their service available as independent authoritative technical members of their profession.

Yours sincerely
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