

**SUMMARY REPRESENTATIONS FROM THE PUBLIC AND STAKEHOLDER CONSULTATION PROCESS ON THE
PROPOSED NUMBERING NAMING ADDRESSING AND IDENTIFICATION (NNAI) FRAMEWORK HELD BETWEEN
SEPTEMBER 17TH 2025 AND NOVEMBER 28TH 2025**

No.	Stakeholder	Section	Current content	Proposed content	Stakeholder Justification	CA Comment	CA Justification	New content
1.	Airtel	5.1	This framework prescribes the architecture of the national Numbering, Naming, Addressing, and Identification (NNAI) plan, application Procedures, and the fees applicable to various types of numbering resources.	This framework prescribes the architecture of the national Numbering, Naming, Addressing, and Identification (NNAI) plan, application procedures.... We propose the removal of the fees part	typo	Noted	None	This framework prescribes the architecture of the national Numbering, Naming, Addressing, and Identification (NNAI) plan, application procedures Not Applicable
		6.22	Facilitating access to value-added and Over-the-top (OTT) services;	Facilitating access to value-added and Over-the-top (OTT) services;	typo	Noted	None	Facilitating access to value-added and Over-the-top (OTT) services;

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		8.4.3	The Authority reserves the right to revise the structure and length of dialling digits as may be necessary to align with technological developments, evolving market needs, and international standardization requirements.	The Authority reserves the right to revise the structure and length of dialling digits as may be necessary to align with technological developments, evolving market needs, and international standardization requirements.	Type	Noted	None	The Authority reserves the right to revise the structure and length of dialling digits as may be necessary to align with technological developments, evolving market needs, and international standardization requirements.
		8.5.2	All emergency num,bers shall be universally accerssible free of charge from any telecommunications network, irrespective of the caller's credit balance or subscription status	All emergency numbers shall be universally accessible free of charge from any telecommunications network, irrespective of the caller's credit balance or subscription status	typo	Noted	None	All emergency numbers shall be universally accessible free of charge from any telecommunications network, irrespective of the caller's credit balance or subscription status
		8.6.2	Table 7: EAC RACs	Revise the table accordingly Since addition of new partner states, the framework should recognize that we now have DRG, South Sudan and Somalia.	The table will be used by operators when configuring the traffic routing table in systems. This is because we have special tariffs normally e.g. ONA directives.	Noted but not implemented	RAC Codes for DRC and South Sudan not yet discussed at EACO. Somalia is currently not a Member of EACO	Not Applicable

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		8.6.4	All licensed network operators and service providers shall ensure that their systems are configured to support and correctly interpret these dialling prefixes and RACs, in compliance with directives from the Authority and harmonisation frameworks developed under EACO.	All licensed network operators and service providers shall ensure that their systems are configured to support and correctly interpret these dialling prefixes and RACs, in compliance with directives from the Authority and harmonisation frameworks developed under EACO.	typo	Noted	None	All licensed network operators and service providers shall ensure that their systems are configured to support and correctly interpret these dialling prefixes and RACs, in compliance
		8.9.3	The NCCs allocated to EAC Partner States for use in designated border zones are as follows:	Revise the table accordingly Somalia is now an EAC Partner state and should be included	This will allow operators to configure our traffic routing tables	Noted but not implemented	Somalia is currently not a Member of EACO	Not Applicable
		9.2	New addition	For purposes of calculating the annual charges using the formula in Annex 1, for Platinum, Gold and Silver in any given MNDC, the minimum and maximum assignment for each of this category of numbers within an MNDC shall always be equal.	This is included for clarity and to ensure that there is no ambiguity during implementation or reviews.	Adapted	For clarity on the formula used for calculating the fees for MNDCs	Annex 1 amended to include: *for MNDC y=z

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		10.4	Table 10 row 2 on NFP-T1 – eligible numbers “Mobile Network Code (MNC), International Signalling Point Code (ISPC), Mobile Telephony numbers(MTN), Toll Free Numbers (TFN), Premium Rate Numbers (PRN), Mobile Number Portability Routing Codes (MNP-RC)	We propose deletion of International Signalling Point Code (ISPC) from table 10 row 2 under NFP-T1.	International Signalling Point Code (ISPC) is given to International Gateway System Services licensees and not NFP-T1’s Licensees.	Adopted	ISPC is given to licensees with IGSS license	International Signalling Point Code deleted from Table 10 row 2
		12.1	shall ONLY utilize the facilities of licensed network pp erators for the interconnection of your systems to the international gateway, national and local networks.	shall ONLY utilize the facilities of licensed network <i>operators</i> for the interconnection of your systems to the international gateway, national and local networks.	typo	Noted	None	shall ONLY utilize the facilities of licensed network operators for the interconnection of your systems to the international gateway...
		12.4	The assigned numbers shall NOT be sold, transferred, traded or re-assigned to another entity or user without the authority of the Authority	We propose deletion of this guideline 12.4	Licensees re-assign numbers to end users, we also have secondary assignments by some Licensees, and sometimes Platinum, Gold and silver numbers are charged, we propose that this clause be removed as it contradicts the	Adapted	The condition is meant to restrict a primary assignee from transferring the assigned resources to another primary assignee who proceeds to issue them on secondary basis	The numbers assigned by the Authority on primary basis shall NOT be sold, transferred, traded or re-assigned to another licensee on primary basis for assignment on secondary basis

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					purpose for which numbering resources are obtained by Licensees. This condition can only apply to non-commercial numbers.			
		12.10	New addition	We note that the CA has not defined the duration of inactivity required before a number is recycled and reissued to another customer. This was only specified in one of our number assignment letters but should be specified in the regulations.	This is to ensure that this requirement is documented and that consumers and public are aware of this requirement. We do not want customers to sue us for deactivating their numbers after six months.	Adopted	For clarity and consistency across all service providers on the duration of inactivity before recycling	Shall recycle all numbers previously assigned to end users but have remained inactive for a period of 180 consecutive days
		14.4	Chargeable numbers shall be International Signalling Point Code (ISPC), Mobile Network Code (MNC), Premium Rate Numbers (PRN), Toll Free Numbers (TFN), National Signalling Point Codes (NSPC) and Betting Short Codes	We note that Mobile National Destination Code (MDNC) is not part of the chargeable numbers. Secondly there is a typo of the word chargeable	None	Noted	MNDCs are part of numbers to be charged	Chargeable numbers shall be International Signalling Point Code (ISPC), Mobile Network Code (MNC), Mobile National Destination Code (MNDC) , Premium Rate Numbers (PRN), Toll Free Numbers (TFN), National Signalling Point Codes (NSPC) and Betting Short Codes

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		19	<p>Service providers shall put in place legal and technical measures to safeguard against the use of their systems for dissemination of unauthorized content, including without limitation: offensive, obscene, sexually suggestive, explicit or seditious information.</p>	<p>We propose that this be deleted</p>	<p>Based on our comments in column 3, implementation of this requirement by Licensees leads to infringement of the rights to privacy as stated in the Article 31(d) of Constitution of Kenya, 2010 which states that: - “Every person has the right to privacy, which includes the right not to have— (d) the privacy of their communications infringed. Further privacy is also provided for in the the Kenya Information and Communications (Consumer Protection) Regulations, 2010 Regulation 3(1) (d) which also states that: - (1) A customer shall have the right to— (d) personal privacy and protection against unauthorized</p>	<p>Not adopted</p>	<p>Service Providers should be able to block reported numbers involved in broadcast of unauthorized content. All subscribers should be empowered to be able to block numbers spamming them</p>	<p>Not Applicable</p>

No.	Stakeholder	Section	Current content	Proposed content	Stakeholder Justification	CA Comment	CA Justification	New content
		Annex 1	Charging Methodology	We propose the following notes to be added after the formula in Annex 1 as follows: - <i>Note 1: For purposes of deriving charges for Platinum, Gold and Silver per MNDC, the value for "c" shall be license fees applicable for ASP License.</i>	use of personal Information. To ensure there is clarity and avoid different interpretations during implementation.	Adapted	For clarity on the applicable license type determine resource eligibility and license fees	Annex I: <i>For ISPC the associated license fees are for IGSS For MNC the associated license fees are for NFP-TI</i>
		Annex 2	Numbering Fees Schedule Per Number	We propose to merge 7.1, 7.2 and 7.3 into one row and charge Ksh. 100,000/= instead of separating them.	We should not consider Platinum, Gold, Silver numbers as different categories for purposes of application of the formula in Annex 1.	Not Adopted	The fees are derived from the provided charging model in Annex 1 based on each classification of the numbers despite the model yielding the same fees	Not Applicable
2.	Safaricom PLC	6.2.1	Identifying applicable tariffs and service categories	Identifying applicable service categories	NNAI resources identify service categories and not applicable tariffs. The definition of a tariff under the Tariff Regulations (2010) means any charge, price, levy, and underlying terms and conditions imposed by a	Not Adopted	Definition provided not the same as in the Regulation Certain categories of numbers such as Premium Rate Numbers signify higher tariffs	Not Applicable

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					licensee for the services which cannot be determined from numbering resources.			
		6.2.3	Enabling linkages with financial platforms	Enabling linkages with financial platforms and public service platforms, or such platforms as shall be relevant in the future.	This will also accommodate linkages with public service platforms such as E-Citizen, SHA, and Ardhi Sasa, or such platforms as shall be developed in the future.	Adapted	The growing use cases for numbering resources	Enabling linkages with financial, social and public service platforms
		6.3.3	none	Subsection does not have associated text. Provide missing text if this is an omission, and/or delete if it is a type.	For completeness of the document.	Adopted	None	Deleted
		7.1 Table 2	4. International Signalling Point Codes X-ABC-Z X=6; ABC=078; 0≤Z≤9	International Signalling Point Codes X-ABC-Z X=6; ABC=078; 0≤Z≤8 X=6; ABC=079; 0≤Z≤9	The inclusion of the missing international signalling point code is key to the routing of Safaricom's international traffic. Omitting this key resource would create congestion on the remaining international call routing resource.	Adopted	Due to exhaustion of 078, 079 was introduced	X-ABC-Z X=6; ABC=078; 0≤Z≤8 X=6; ABC=079; 0≤Z≤9

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		8.2.	Table 4- Short code structure	6ABCD Range: $0 \leq A \leq 9$ $0 \leq B \leq 9$ $0 \leq C \leq 9$ $0 \leq D \leq 9$ 7ABCD Range: $0 \leq A \leq 9$ $0 \leq B \leq 9$ $0 \leq C \leq 9$ $0 \leq D \leq 9$ 8ABCD Range: $0 \leq A \leq 9$ $0 \leq B \leq 9$ $0 \leq C \leq 9$ $0 \leq D \leq 9$	These short codes are already allocated to Safaricom as follows: 6- Controlled access to restricted/adult content. 7. Informational 8. Informational	Not Adopted	The current numbering plan is being enhanced, this entails re-allocation of short codes to new services. Allocated short codes that are not yet assigned to end users will be reclaimed. Allocated short codes that are already assigned to end users will remain in service until their natural end	Not Applicable
		8.3.6 Table 5:	YABCD $2 < Y < 8$ $0 < A < 9$ $0 < B < 9$ $0 < C < 9$ $0 < D < 9$ $0 < E < 9$	YABCD $2 < Y < 8$ $0 < A < 9$ $0 < B < 9$ $0 < C < 9$ $0 < D < 9$	$0 < E < 9$ is missing from the sub-level YABCD in the table.	Adopted	These are 5-digit short codes therefore the sixth digit E doesn't apply	Deleted $0 < E < 9$
		8.4.1	The standard length of dialled numbers used for commercial voice telephony services, excluding the country code and national prefix (e.g. 0), shall be nine (9) digits.	The standard length of dialled numbers used for commercial voice telephony services, excluding the country code and national prefix (e.g. 0), shall be ten (10) digits.	This change will increase NDC capacity from 1Million to 10 million, which will result in the 07xx series being sufficient to serve all MNOs systematically. This will improve	Not Adopted	The current length of 10-digits provides enough capacity to cater for the Kenyan population which stands at approx. 60M	Not Applicable

No.	Stakeholder	Section	Current content	Proposed content	Stakeholder Justification	CA Comment	CA Justification	New content
					<p>customer experience as there will be no confusion as to which NDC belongs to which network. For example, the current assignments are in place. NDC 076x (X=0 to 9) is shared between Airtel, Finserve, and Safaricom. NDC 074X (X=0 to 9) is allocated to Safaricom, Homelands Media, Jamii, and IEBC. NDC 075X (X=0 to 9) is shared between Airtel and Safaricom. 0740 to 0743 & 0748 are allocated to Safaricom PLC, 0744 is allocated to Homeland Media 0747 is allocated to Jamii, and 0749 is allocated to IEBC. Increasing the length of the MDCs will address the above challenge.</p>			

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		8.4.2.1	SC-3: Three-digit codes designated for emergency and essential services;	SC-3: Three-digit codes designated for emergency and essential services (government and common operator services)	The alignment is necessary to ensure consistency and clarity in the categorization of services under Level 1	Adapted	Common operator services will also have designated 3-digit codes	SC-3: Three-digit codes designated for emergency, essential and common operator services;
		8.5.1 Table 6	Table 6: National emergency numbers	National emergency Numbers 999 112 116 911	The number is already accessible to customers in Kenya as a national emergency number. It is therefore in the public interest to legitimize it as an emergency service for Kenya. Kenyan MNOs serve inbound roamers from countries such as the USA, Canada, where 911 is a national emergency number; therefore, its recognition as an emergency service would improve the customer experience for this customer segment. In Africa, Ethiopia has designated 911 as a primary national	Not Adopted	According to WTSA-24 (New Delhi,) Res. 100 resolved to have one common emergency number for Africa which is 112. In line with this resolution, Kenya has only two emergency numbers (999 and 112). 116 is designated as a Child Helpline therefore 911 cannot be added to the list of the emergency numbers which will create a bloated list of emergency numbers	Not Applicable

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		8.5.5	The Authority may, where necessary, allocate additional or temporary numbering resources for crisis response, which shall be made available without charge for the duration of the emergency.	The Authority shall, where necessary, allocate additional or temporary numbering resources for crisis response, which shall be made available without charge for the duration of the emergency.	The obligation to emergency number under its National numbering Plan. The obligation to allocate numbers allocated for crisis response should be mandatory, as some of these can be a threat to human life, and even national security and the economy at large. Therefore, the Authority should always be ready to allocate such resources to be used by the Public.	Not Adopted	The decision will be made based on prevailing circumstances	Not Applicable
		8.7.3	6-079-Y where 078 is the Hierarchical International Point Code Area for Kenya	6-079-Y where →079 is the Hierarchical International Point Code Area for Kenya	Correct typo	Adopted	Due to exhaustion of 078, 079 was introduced	→079 is the Hierarchical
		Table 9	2. Mobile Numbers = 1M	2. Mobile Numbers = 10M.	This change will increase NDC capacity from 1Million to 10million, which will result in the 07xx series being sufficient to serve all MNOs systematically. This	Not Adopted	The current length of 10-digits provides enough capacity to cater for the Kenyan population which stands at approx. 60M	Not Applicable

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					<p>will improve customer experience as there will be no confusion as to which NDC belongs to which network. For example, the current assignments are in place. NDC 076x (X=0 to 9) is shared between Airtel, Finserve, and Safaricom. NDC 074X (X=0 to 9) is allocated to Safaricom, Homelands Media, Jamii, and IEBC. NDC075X (X=0 to 9) is shared between Airtel and Safaricom. 0740 to 0743 & 0748 are allocated to Safaricom PLC, 0744 is allocated to Homeland Media 0747 is allocated to Jamii, and 0749 is allocated to IEBC. Increasing the length of the MDCs will address the above challenge.</p>			

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			9- SC-3 – Maximum 1 10-SC-4 –Maximum 1	9. SC- 3 -Maximum assignment –A block of 10 SC- 4 -Maximum assignment-A block of 10	The increased maximum assignment allows MNOs and other providers to apply for and be allocated a block of numbers to meet the business needs and to effectively support customer experience, and speed to market/execution.	Not Adopted	3 digit and 4 digits short codes are assigned to a service which is offered by either a government entity or NGO therefore it can only be assigned one at a time	Not Applicable
	11		Application for numbering resources shall be via the Numbering Management System (NMS), where the following documentation shall be attached to the application: 11.1. Valid Compliance Certificate for the relevant License from the Authority 11.2. Authorization letters or applicable licenses from other government offices or agencies, where applicable (e.g. CBK, BCLB etc). 11.3. A comprehensive	Application for numbering resources shall be via the Numbering Management System (NMS). For new applicants/licenses the following documentation shall be attached to the application: 11.1. Valid Compliance Certificate for the relevant License from the Authority 11.2. Authorization letters or applicable licenses from other government offices or agencies, where applicable (e.g. CBK, BCLB etc).	The application process for numbering resources should not be burdensome for existing MNOs. The process should be simple similar to application for spectrum as these resources enable existing Network Facilities Provider Tier1 licensees to operationalize their licenses.	Not Adopted	The requirements are dependent on the type of service and time of application; however, the application process will be seamless	Not Applicable

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			<p>network topology indicating points of interconnection with Network Facility Provider equipment and other licensees as applicable to your service.</p> <p>11.4. Frequency spectrum assignment letter, where applicable</p> <p>11.5. Existing numbering resource assignments and utilization status</p> <p>11.6. Framework for protection of minors, complaints resolution handling and client exit From the service, where applicable.</p> <p>11.7. A general tariff guide for the various services to be delivered on the numbering resource(s).</p> <p>11.8. Any other requirement that the Authority may prescribe from time to time.</p>	<p>11.3. A comprehensive network topology indicating points of interconnection with Network Facility Provider equipment and other licensees as applicable to your service.</p> <p>11.4. Frequency spectrum assignment letter, where applicable</p> <p>11.5. Existing numbering resource assignments and utilization status</p> <p>11.6. Framework for protection of minors, complaints resolution handling and client exit from the service, where applicable.</p> <p>11.7. A general tariff guide for the various services to be delivered on the numbering resource (s).</p> <p>11.8. Any other requirement that the Authority may prescribe from time to time.</p>	None	Adopted	Resources are to be brought into service within six months from the date of assignment	Shall bring the numbering resource into service within six (6)
		12.5	Shall bring the numbering resource into service within six (6)	Shall bring the numbering resource into service within six (6)				Shall bring the numbering resource into service within six (6)

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			months from the date of this letter	months from the date of assignment				months from the date of assignment
		12.6	Shall notify the Authority atleast four (4) weeks before commissioning its network to enable inspection of the network before commissioning and activation of the numbering resource	New licensees shall notify the Authority at least four (4) weeks before commissioning their network to enable inspection of the network before commissioning and activation of the numbering resource	Applying this precondition to existing networks will cause unnecessary delays in service rollout	Not Adopted	The condition applies to all licensees, and the Authority can inspect even existing licensees	Not Applicable
		12.8	Additional Numbers may be assigned by the Authority, where on evidence of 90% activation of the assigned numbering resource (s) within a service category	Additional Numbers may be assigned by the Authority where on evidence of 60% activation of the assigned numbering resource (s) within a service category.	Increasing the threshold from the current 80% to 90% will delay service rollout as it takes at least 6 months to configure, test, and activate an NDC (Both for local and international operators, ultimately hampering sector growth. Further, this will address the current challenges Safaricom is facing with the recycling of lines and the pending assignment of new numbers. Ethiopia's NNP prescribes a	Not Adopted	The condition is aimed at ensuring efficient utilization of the finite numbering resource	Not Applicable

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		13.6	New provision	CLI masking for international calls where the voice telephony provider masks the international CLI with a local one to avoid paying the international termination rate.	60% activation threshold to justify the allocation of additional resources. This proposal will address the SIM box challenge faced by MNOs.	Adapted	To address International Telephony fraud	CLI hiding where a voice telephony service provider terminates calls without displaying the calling number or altering the original CLI
		14.4	There will be two categories of numbering fees, namely, Application Fees and Annual Numbering Fees. 14.1. Application Fees are a non-refundable Fee that will be charged for each application for assignments or reservations of numbering resources, before any resource is assigned. 14.2. Annual Numbering Fees (ANF) is an Annual Numbering Fee (ANF) payable every 1st July of each year for all the numbers held by a	Delete section 14.4 in its entirety	MNOs are subjected to various taxes levies and fees such as, annual license fees, including service fund (USF) levies and recurring spectrum fees imposed on their revenues. Kenya as noted by the GSMA has one of the highest sector-specific taxes in the sub-Saharan region including the frequent tax reforms, with several increases https://www.gsma.com/solutionsand-	Not Adopted	Based on cost recovery for regulatory oversight for acquisition of system and tools and human resources which are not covered by levies. Numbering resources are finite for national assets. Charging for their allocation and encourages efficient utilization. Alignment with International and Regional Best Practice. Charging for numbering resources is a delegated authority, provided it is transparent, proportionate	Not Applicable

No.	Stakeholder	Section	Current content	Proposed content	Stakeholder Justification	CA Comment	CA Justification	New content
			<p>licensee as of that date. 14.3. Annex 1 contains the charging model adopted. 14.4. Chargeable numbers shall be International Signalling Point Code (ISPC), Mobile Network Code (MNC), Premium Rate Numbers (PRN), Toll Free Numbers (TFN), National Signalling Point Codes(NSPC) and Betting Short Codes 14.5. Certain numbers are Exempt from Charging, among them are: 14.5.1. National Emergency Numbers (112& 999) , Child helpline (116), Customer Care number (100), Customer Care numbers for Mobile Money services 14.5.2. Harmonized East African Short Codes, harmonized Network Colour Codes and dialing prefixes in the range 000 to 009</p>		<p>impact/connectivity-forgood/ public-policy/wycontent/uploads/2023/10/Mobile-Tax-Policy-and-Digital-Development-A-study-of-markets-in-Sub-Saharan-Africa.pdf. Therefore, any additional levies for numbers will negatively impact the sector and the economy as follows. 1. Increases the cost of access to services by customers as MNOs will be forced to push the cost to consumers. 2. Increase the operational costs for MNOs will disincentivize investment in the sector and negatively impact broadband roll-out & access</p>			

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			<p>14.5.3. Numbers for Prepaid credit updates and balance checks</p> <p>14.5.4. Number Portability Routing Codes</p> <p>14.5.5. Numbers allocated for use by National and County Governments to support social, security, humanitarian services and promotion of public services.</p> <p>14.6. The Authority may exempt other numbers from fees, from time to time and for a prescribed period</p>		<p>and financial inclusion.</p> <p>3. Increase barriers to entry for new entrants and existing exit from the market for existing licensees.</p> <p>4. Negatively impact governments' revenue and slows down the Government Digital Agenda.</p> <p>Further, according to the World Bank report - Taxes and Parafiscal Fees on Digital Infrastructure Services in Africa, the regulatory fees, such as numbering fees, may add to the complexity of the fee structure, burden on MNOs with existing fees, and may also increase compliance costs.</p> <p>http://documents.worldbank.org/cur</p>			

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					<p>ated/en/09905192416 5515718</p> <p>We also note that, similar to Kenya, other countries in Africa, like Egypt, South Africa, Madagascar, and Morocco, do not charge for numbering resources. Maintaining the current model will enable Kenya MNOs to invest in network expansion and participate meaningfully in the digital economy.</p>			
	Annex 1		Charging methodology	Delete in its entirety	As above	Not Adopted	<p>Based on cost recovery for regulatory oversight for acquisition of system and tools and human resources which are not covered by levies.</p> <p>Numbering resources are finite for national assets.</p> <p>Charging for their allocation and encourages efficient utilization.</p> <p>Alignment with International and Regional Best Practice.</p>	Not Applicable

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							Charging for numbering resources is a delegated authority, provided it is transparent, proportionate	
		Anne x 2	Numbering Fee Schedule per number	Delete in its entirety	As above	Not Adopted	Based on cost recovery for regulatory oversight for acquisition of system and tools and human resources which are not covered by levies. Numbering resources are finite for national assets. Charging for their allocation and encourages efficient utilization. Alignment with International and Regional Best Practice.	Not Applicable
							Charging for numbering resources is a delegated authority, provided it is transparent, proportionate	

Signed:



Director General/CEO
Communications Authority of Kenya

29/04/2026.
Date

