

Unwanted Witness: Regulate for Inclusion, Not Exclusion
Position Statement on UCC's Directive to Unlicensed Wi-Fi Hotspot
Operators

For Immediate Release

19 October 2026 | Kampala, Uganda; Unwanted Witness is concerned by the Uganda Communications Commission's (UCC) [directive](#) requiring operators of unlicensed public Wi-Fi hotspots to shut down their businesses within seven days or face enforcement action, including the removal of installations and seizure of equipment.

While we recognize the importance of lawful telecommunications operations, consumer protection, cybersecurity and the safety of communications infrastructure, regulation must not come at the expense of affordable internet access, small business livelihoods and the right of Ugandans to participate meaningfully in the digital economy.

Uganda cannot achieve digital inclusion by shutting down the very community-level initiatives helping people get online.

Affordable connectivity must remain a national priority

Neighborhood Wi-Fi hotspots have emerged as an alternative for Ugandans who cannot consistently afford conventional internet packages. By offering connectivity at relatively low prices, these businesses help students access learning materials, traders reach customers, young people seek employment and small enterprises participate in the digital economy.

The decision to shut down approximately 4,000 operators therefore raises important questions about the future of affordable community connectivity and the livelihoods that have developed around it.

In our *May 2026* policy analysis, [The Triple Constraint on Uganda's Digital Economy](#), Unwanted Witness demonstrated how high connectivity costs, limited public investment and restrictive governance combine to constrain digital participation. The report highlighted that telecom services face a substantial cumulative tax burden and that the gap between registered SIM cards and active internet users points to affordability as a major barrier to meaningful access.

Against this background, measures that eliminate lower-cost access options without providing viable alternatives risk deepening existing inequalities, particularly for low-income households, students, young people and informal-sector businesses.

Licensing should enable compliance, not make exclusion inevitable

We acknowledge UCC's concerns about unlicensed internet resale, fair competition, consumer protection, cybersecurity and the protection of telecommunications infrastructure. Internet service providers must operate within a clear regulatory framework, and consumers deserve reliable services, protection of their personal data and effective avenues for redress.

However, effective regulation requires more than identifying non-compliance and ordering businesses to close. It must also examine whether existing licensing arrangements are accessible, proportionate and appropriate for small-scale community connectivity models.

The reported licensing fees of **USD 3,000** for a regional Public Service Provider license outside the Central Region and **USD 30,000** for an Internet Service Provider license in the Central Region raise legitimate questions about whether small operators can realistically formalize their businesses under the available arrangements.

If the cost of compliance is beyond the reach of the businesses being regulated, enforcement risks becoming a mechanism of exclusion rather than a pathway to lawful operation.

We are particularly concerned that a seven-day ultimatum, accompanied by the threat of equipment seizure, may not provide sufficient time for affected operators to understand their obligations, obtain advice, assess their options and transition into compliant business models.

UCC should therefore publish clear licensing requirements, explain the applicable legal obligations, engage affected operators and establish a realistic transition period before resorting to punitive enforcement.

Formalization must not undermine affordability

The regulator's responsibility to protect consumers should be pursued alongside its responsibility to foster a competitive, accessible and innovative communications environment.

The fact that some hotspot operators reportedly charge approximately **UGX 1,000** per gigabyte, compared with an average retail price of **UGX 2,000** cited by UCC, underscores the importance of understanding why consumers are seeking alternative connectivity arrangements. These prices do not, by themselves, establish whether the services are sustainable, secure or compliant. They do, however, warrant a closer examination of affordability and market access.

Rather than treating the growth of community hotspots exclusively as a regulatory problem, UCC should consider whether it also reflects unmet demand for affordable internet services and gaps in existing connectivity models.

The objective of regulation should be to bring these businesses into a framework that protects consumers, encourages fair competition and preserves the public benefits of affordable access. Where necessary, UCC should work with licensed internet service providers to develop authorized reseller arrangements, simplified licensing categories and partnerships that allow community operators to serve underserved areas.

Protect users' data and rights through practical safeguards

Public Wi-Fi services can present genuine risks, including insecure networks, misuse of personal information, inadequate complaint mechanisms and cybersecurity vulnerabilities. These risks must be addressed.

However, licensing alone does not guarantee that personal data will be handled lawfully or that users will be protected from digital harm. Appropriate safeguards must be implemented and enforced in practice.

Any framework for community Wi-Fi providers should include clear and proportionate requirements on network security, transparent pricing, consumer complaints, responsible handling of personal information and compliance with applicable data protection law. Requirements should reflect the nature and scale of the service while maintaining meaningful protections for users.

UCC should also clarify how its proposed framework will protect consumers during the transition, including those who currently depend on these hotspots for education, work, communication and access to essential online services.

Our position and recommendations

Unwanted Witness calls upon the Uganda Communications Commission and the relevant government agencies to:

1. **Reconsider the seven-day shutdown ultimatum** and introduce a reasonable transition period during which operators can understand and meet applicable licensing requirements.
2. **Develop an affordable and proportionate licensing framework** for small-scale and community Wi-Fi operators, including simplified registration and authorization pathways where legally appropriate.
3. **Facilitate partnerships with licensed internet service providers** to enable compliant resale arrangements, especially in underserved communities where affordable connectivity remains limited.
4. **Conduct meaningful consultations** with hotspot operators, telecommunications companies, consumer representatives, civil society and other stakeholders before implementing measures with significant implications for digital access and livelihoods.
5. **Ensure proportionate enforcement and due process**, with clear legal grounds, transparent procedures and appropriate opportunities to remedy non-compliance before punitive measures are taken, except where urgent action is demonstrably necessary to address an immediate and serious risk.
6. **Publish clear guidance on licensing obligations and associated costs**, including the specific requirements applicable to different categories of operators, so that compliance is predictable and accessible.
7. **Protect affordability and consumer choice** by assessing how the proposed enforcement measures will affect internet prices, competition, access in underserved communities and the livelihoods of small digital entrepreneurs.
8. **Strengthen practical consumer protection and data security safeguards** across the connectivity ecosystem, ensuring that regulatory compliance translates into meaningful protection for internet users.

Digital transformation must work for everyone

Uganda's digital transformation agenda should be measured not only by the expansion of telecommunications infrastructure or the number of licensed operators, but also by whether ordinary citizens can afford to connect, businesses can innovate and underserved communities can participate.

A regulatory framework that protects infrastructure and promotes compliance while making internet access less affordable would undermine these objectives.

The challenge before UCC is not simply how to eliminate unlicensed Wi-Fi hotspots. It is how to create a communications environment in which community connectivity businesses can operate lawfully, consumers are protected and affordable internet access expands.

Unwanted Witness calls for a shift from enforcement centered on shutdowns to regulation centered on inclusion, accountability and practical compliance.

Uganda needs a digital economy that is safe, competitive and affordable. Regulation should open pathways into that economy, not close them.

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About Unwanted Witness

Unwanted Witness is a Uganda-based digital rights organization working to advance privacy, data protection, freedom of expression and inclusive digital participation. The organization promotes a people-centered, rights-based approach to digital governance and advocates for policies that enable equitable access to digital technologies.