

**RESPONSE TO
PROPOSAL TO REVIEW THE ECTEL REGIONAL RADIO
SPECTRUM PLAN**

LIME

Landline | Internet | Mobile | Entertainment

By E-mail to: consultation@ectel.int

10 September 2010

I. Introduction

1. CWI Caribbean Limited, on behalf of its affiliates Cable & Wireless St. Kitts and Nevis Limited, and Cable & Wireless St. Lucia Limited, trading as LIME (“LIME”), is pleased to provide the following comments in response to the Commission’s August 2010 consultation document on the ‘*Proposal to Review the ECTEL Regional Radio Spectrum Plan*’ (the proposed spectrum plan).

2. LIME expressly states that failure to address any issue raised in this consultative document does not necessarily signify its agreement in whole or in part with ECTEL’s position on the issue. LIME reserves the right to comment on any issue raised in the consultation at a later date.

II. General Comments

3. LIME agrees with the review of the spectrum plan to better align it with the international best practices for spectrum management and frequency allocation, bearing in mind the needs of local businesses.

4. LIME has identified gaps regarding the bands that are being used to provide services currently and the bands proposed for use for those services. Accordingly, LIME sets out in this document the bands which it is aware are being used, but which are not included in the proposed spectrum plan.

5. LIME has also discerned that it is possible that the proposed spectrum plan may result in relocations, a matter which has not been addressed at all in the proposed

spectrum plan. It is necessary for ECTEL to evaluate and communicate to the industry any relocation or potential for relocation which may be a consequence of the proposed spectrum plan.

III Spectrum for Mobile TV

6. While ECTEL provides that the bands 454.975 to 462.5625 and 467.7125-470 Mhz are allocated for outside broadcast television and radio, it is not clear that mobile television is included. LIME request that the Commission clarifies which, if any bands, have been allocated to mobile TV.

7. As ECTEL is aware, in recent years there has been massive growth in, and a proliferation of mobile services. New technologies are being developed to facilitate the streaming of television services to mobile handsets. There have been increasing launches of mobile television services in Europe, Asia and Africa, and commercial and technical trials continue worldwide.

8. LIME recommends that the UHF band (470-862 MHz) be made available for mobile TV services. The reasons for this are as follows:

(i) Fewer transmitters are needed if the UHF band is used, making it more economically viable to use the UHF band;

(ii) It is more expensive to obtain handsets for use outside of the UHF frequency range;

(iii) UHF is more desirable than VHF bandwidth. Using VHF bandwidth can create terminal size problems due to the requirements for large handset antennas;

(iv) UHF is more desirable than the L band, as the L band is more expensive; and

(v) There is an international move towards the allocation of the UHF band for mobile TV services.

9. If bands have in fact not been allocated for Mobile TV, LIME recommends that the proposed spectrum plan be further reviewed to take account of this important technological development.

IV GSM Band Commonwealth of Dominica

10. Paragraph E.8 states that in the Commonwealth of Dominica the band 912-915 is allocated to GSM Services. As far as LIME is aware, in the Commonwealth of Dominica, the following bands are used for GSM service:

- GSM-850 from 824.0–849.0 for Uplink and 869.0–894.0 for Downlink
- P-GSM-900 from 890.2–914.8 for Uplink and 935.2–959.8 for Downlink
(overlaps 4 MHz with 850)
- DCS-1800 from 1710.2–1784.8 for Uplink and 1805.2–1879.8 for Downlink
- PCS-1900 from 1850.0–1910.0 for Uplink and 1930.0–1990.0 for Downlink

V. Future Mobile Services

11. Paragraph E.10 states that the band 1990-2025 MHz is allocated for future Mobile Services, such as 3G mobile services. LIME submits that this band should include all bands for 3G services in our region which are:

- 850 name: Cellular 824 - 849 869 - 894 900 name: GSM 880 - 915 925 - 960 (overlaps 14 MHz with 850)
- 1800 name: DCS 1710 - 1785 1805 - 1880
- 1900 name: PCS 1850 - 1910 1930 - 1990
- 1700 name: AWS 1710 - 1755 2110 - 2155

VI Band Allocation for Broadband Services

12. Paragraph E.11A references *Band Allocation for Broadband Services*. LIME notes that the band 1990-2025 MHz is allocated for future mobile services.

13. LIME recommends that a deeper analysis of this technology should be done to specify the bands and different duplexing schemes. To LIME's knowledge the proposed bands are not consistent with assignments that have already been made within some ECTEL countries.

VII. Conclusion

14. LIME trusts that the comments set out above will receive favourable consideration by ECTEL and the Commissions.

15. Please send any communication in relation to this consultation to:

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