

Digicel

The Bigger, Better Network.

Digicel's Comments on Proposal to Review the ECTEL Regional Radio Spectrum Plan

September 2010

Table of Contents

1 INTRODUCTION AND NEED FOR HARMONISATION3

2 SPECTRUM RE-USE.....4

GSM FREQUENCIES IN DOMINICA.....4

2.5 GHz4

3 CONCLUSION5

Introduction

Digicel thanks the National Telecommunications Regulatory Commission for giving us the opportunity to comment on the ECTEL proposal to review the regional radio spectrum plan. Digicel believes that effective spectrum planning and the making available of spectrum to those best able to make use of it will represent some of the greatest enablers in the development of telecommunications and communications in the region and help to maximise the benefits from these services for the citizens of all Caribbean nations. This is because wireless, as opposed to wired, telecommunications and communications hold out the greatest prospects for growth and innovation.

The Need for Harmonisation

Before making specific comments we wish to draw attention to the work that has been carried out thus far in respect of regional spectrum planning by the Caribbean Spectrum Management Task Force. The Task Force was mandated by the Caribbean Telecommunications Union, as a result of the 7th General Conference of CTU Ministers, to review spectrum management policies and make recommendations for spectrum use in the region.

We hope that ECTEL will be able to work in co-operation with the Task Force, the CTU and the ITU to harmonise and optimise the allocation and use of spectrum in the region. As the Commission will know the Task Force has drafted policy recommendations on regional spectrum management and we hope that these will be taken in to account in the Commission's and ECTEL's deliberations. Those policy recommendations support, for example, the Commission's approach in terms of technological neutrality with respect to the allocation and licensing of spectrum, as does Digicel.

Harmonised spectrum plans make it more practical for both international manufacturers of wireless equipment (through economies of scale for example) and operators of the equipment, to provide equipment and put in place networks which can make best use of the available spectrum. Harmonisation will enable faster utilisation of the spectrum and enables the production of services at lower cost to consumers.

The Commission will be aware of the ITU Region 2 band plan which the CTU and Digicel support. In the light of the drive towards harmonisation we believe that it would have been useful if the consultation had compared spectrum allocations in ECTEL countries with the ITU Region 2 plan. Going forward we suggest that such comparisons are made in future consultations.

Spectrum Re-Use

The consultation document makes reference to the spectrum re-use. Digicel encourages efforts to re-farm spectrum to those better able to make use of it where it is not being utilised, or is not utilised effectively. There are, naturally, a number of factors that have to be considered before re-farming takes place including the impact on any persons currently using the spectrum to be re-farmed; who will bear any costs; and how to re-allocate spectrum that has been clawed back from existing users. But these are issues that can successfully be addressed.

We understand from the consultation that a full audit has been carried out to identify what use is being made of the spectrum identified and by whom. We would encourage the Commission and ECTEL to make available what information they reasonably can in this respect, so that persons interested in particular spectrum can make their case in terms of optimising spectrum use in the future.

GSM Frequencies in Dominica

GSM services are currently allocated within 880-960 MHz band in the Commonwealth of Dominica. We draw the Commission' attention to the fact that the 902-928 MHz band is designated by the ITU-T in Region 2 countries, in to which Dominica falls, as the ISM band, to be used as unregulated spectrum. Therefore, private individuals and organisations can procure equipment to be used within these frequencies. Consequently, any allocation of spectrum for GSM services within the range identified will require stringent regulation in order to prevent unauthorised use by non-GSM licensed operators.

2.5 GHz Band

We disagree with the proposal to limit assignments of spectrum within the 2.5 GHz band to 30 MHz per operator. This is an insufficient allocation of spectrum given the volume of traffic that will be generated. Faced with capacity constraints due to a 30 MHz limitation on spectrum operators would be forced to build additional transceiver sites in order to increase their traffic handling capacity. This is not practical or desirable for the reasons given below:

1/ firstly, the number of additional sites that would be required in the event of a 30MHz spectrum allocation might collapse the business case for providing the service in the first place;

2/ secondly, many countries find it undesirable for environmental and planning reasons to force up the number of sites required to provide wireless telecommunications and communications services. It can also be difficult to obtain permission to build additional sites where residents object. Consequently limiting the amount of spectrum to be allocated in the way suggested would undermine the ability of operators to meet consumer demands.

Therefore, it is our recommendation that rather than dividing this spectrum in to 4 allocations of 30 MHz, it should be split in to two allocations of 60Mhz. This will allow

operators to overlay additional spectrum, and add capacity in that manner, before they are forced to build new sites.

Conclusion

We stand ready to provide any additional information we can in respect of these comments and/or to discuss them with the Commission or ECTEL.

Please note that the comments in this document not exhaustive and Digicel's decision not to respond to any particular issue raised by the Commission or any party does not necessarily represent agreement, in whole or in part with the Commission's position on these issues; nor does any position taken by Digicel in this document mean a waiver of any sort of Digicel's rights in any way. Digicel expressly reserves all its rights. Any questions or remarks that may arise as a result of these comments by Digicel may be addressed to:

Helga McIntyre

Tel: 246-467-7028

Email: helga.mcintyre@digicelgroup.com