

**COMMENTS ON
RESPONSES TO
A POLICY FOR ASSIGNMENT OF 700 MHz SPECTRUM**

LIME

Landline | Internet | Mobile | Entertainment

By E-mail to: consultation@tcitelecommission.tc

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I. Introduction

1. CWI Caribbean Limited, on behalf of its affiliate Cable and Wireless (TCI) Limited, trading as LIME (“**LIME**”), is pleased to provide the following comments on responses to the Commission’s consultation document titled ‘ *A Policy for Assignment of 700 MHz Spectrum* ’ (the consultative document) published April 18, 2011.

2. LIME expressly states that failure to address any issue raised in the responses from Digicel, IslandCom and Andrews Communication Limited (Andrews) does not necessarily signify its agreement in whole or in part with the Commission’s position. LIME reserves the right to comment on any issue raised in those responses at a later date.

II. Comments on Responses

3. LIME is pleased that all the providers, except for Andrews Communications Limited, agree on channelization of the 700 MHz according to the channelization plan established by the FCC in the USA. It is agreed that this would allow providers in the Turks & Caicos Islands to introduce advance services more quickly and afford customers the most cost effective service. It is clear however that 12 MHz is not considered to be sufficient spectrum for any of the operators.

4. All of the responses indicated a level of immediacy for 700 MHz spectrum and underscores the urgency with which the Commission has to act to make the spectrum available. At the same time none of the providers believe that an auction would result in

an equitable distribution of the spectrum and no provider has proposed that an auction should be the primary method of allocating spectrum in the 700 MHz band. Both IslandCom and LIME have recommended that spectrum in the 700 MHz band should be priced no higher than spectrum in the 850 MHz band and Digicel has recommended that the cost of the spectrum should be minimized, even if an auction is conducted.

5. LIME does note with concern Andrews claim that they were granted approval to use spectrum by Executive Council in 1997. As far as LIME is aware, spectrum licences are issued by the Commission (s. 34 of the *Telecommunications Ordinance*) and Andrews' licence, as posted on the Commission's website today, does not reference spectrum in the 700 MHz band. LIME trusts the Commission will address this matter appropriately.

III Conclusion

6. Differences among operators remain as to whether any of the 700 MHz spectrum should be reserved and whether any allocation should be made for emergency services. Even so there is sufficient agreement among the providers to establish a framework within which the Commission can allocate the 700 MHz spectrum.

IV. Closing Remarks

7. LIME thanks the Commission for the opportunity to participate in the consultation. Kindly send any communication in relation to this consultation to:

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