

Digicel

The Bigger, Better Network.

**Digicel's comments on the Second 700 MHz Spectrum Policy
Consultation Document issued 29th June 2012**

The comments as provided herein are not exhaustive and Digicel's decision not to respond to any particular issue(s) raised in the consultation or any particular issue(s) raised by any party relating to the subject matter generally does not necessarily represent agreement, in whole or in part with the Commission or any party on those issues; nor does any position taken by Digicel in this document represent a waiver or concession of any sort of Digicel's rights in any way. Digicel expressly reserves all its rights in this matter generally.

We thank you for inviting Digicel to provide its comments on this consultation and of course are available for any questions you may have.

Please do not hesitate to refer any questions or remarks that may arise as a result of these comments by Digicel to: -

E Jay Saunders
General Manager
Digicel (Turks and Caicos) Ltd

Question 1: FCC Channel Plan: Do you agree with the Commission's proposal to adopt the FCC 700 MHz spectrum channel plan for TCI? If not, explain why not and provide a specific alternative proposal with supporting rationale.

Yes

Question 2: Public Safety Spectrum Reserve: Do you agree with the Commission's proposal to reserve for future use the 700 MHz spectrum designated for public safety use under the FCC channel plan (i.e., 763-775 MHz paired with 793-805 MHz)? If not, explain whether there are any immediate or near term commercial uses for this spectrum, in whole or part, that could also support future public safety requirements.

Digicel thinks that this is better used for commercial purposes given that the TCI will likely use the operators' networks rather than a dedicated public safety band, although we admit that we do not know if there is a prospect of this band being used commercially in the immediate future.

Question 3: Upper D Block Reserve: Do you agree with the Commission's proposal to reserve the Upper D block designated for public safety use under the FCC channel plan for future public safety and/or commercial use? If not, explain whether there are any immediate or near term commercial uses for the Upper D block.

See above.

Question 4: Band 14: Digicel proposed that Band 14 (i.e., as illustrated in Annex 1, 758-768 MHz paired with 788-798 MHz, 20 MHz in total) could be licensed for commercial uses. This band includes the Upper D block and part of the public safety spectrum reserve. Comment on whether there are any immediate or near term commercial uses for this specific spectrum band.

Digicel retains its original views.

Question 5: Lower A Block: Comment on whether there are any immediate or near term practical and economic options for deploying LTE-based services in TCI in the Lower A block in comparison to the Lower B, C and/or Upper C blocks.

This is more or less in line with our expectations as lower A block equipment is not as readily available yet as Lower B and Lower C blocks.

Question 6: Unpaired Lower D and E Blocks: Comment on whether there are any immediate or near term commercial uses in TCI for the unpaired Lower D and E blocks, and also comment on their relative attractiveness compared to the Lower B, C and/or Upper C blocks.

Lower D and lower E blocks are probably of limited use currently as we are not aware of equipment that operates in these bands.

Question 7: "Prime" Spectrum Blocks: Comment on whether you agree that the Lower B, Lower C and Upper C to be the relatively more desirable or "prime" 700 MHz spectrum blocks available for commercial use in TCI at this time.

Both lower B and C as well as upper C are the most prevalent blocks of spectrum in use in North America so in general we agree with this statement.

Question 8: 700 MHz Spectrum Assignment Options: Provide your views on the Commission's two 700 MHz spectrum assignment options, indicating your preference for either Option 1 or 2 with supporting rationale. Please provide any alternative proposals you may have, with supporting rationale.

We agree that option 2 where two operators one getting the Lower B and C and the other getting the upper C is the way to go. Alternatively, if two operators are prepared to network share or wholesale one to the other then we suggest that they are able to obtain the Lower B plus C blocks or the upper C block plus have first refusal on a remaining block of their choice.

Question 9: Spectrum for LTE Deployment Purposes: The Initial Consultation Document focused exclusively on the use of 700 MHz spectrum for the deployment of 4G LTE technology. Provide your views on whether 4G LTE technology could be effectively deployed using spectrum in other frequency bands (e.g., 1700/2100 MHz, 2500/2600 MHz or other frequency bands) taking into account the geography and demographics of TCI. If not, explain why not.

It could be done but it is harder to deploy LTE in the higher bands due to propagation issues. However there is more spectrum available at the higher bands so faster speeds are attainable in the higher bands.

Question 10: Spectrum for LTE Deployment Purposes: Explain whether any spectrum currently assigned to your company could potentially be used for the deployment of 4G LTE services and, if so, in what time frame.

No. Digicel do not have enough existing spectrum to allow us to deploy LTE. Digicel's existing spectrum is fully utilised by our GSM and planned UMTS services

Question 11: Spectrum Assignment Methodology: Provide your views on the Commission's conditional two-stage comparative selection process for awarding 700 MHz spectrum. Please provide any alternative proposals you may have, with supporting rationale.

This sounds sensible.

Question 12: Stage Two Comparative Selection Criteria: Provide your views on the proposed second-stage comparative selection criteria, including what specific criteria you consider should be either added to or deleted from the list, if any, with supporting rationale. In addition, provide your views on the possible relative weighting of the criteria.

Again, this sounds sensible and we have no additional criteria to add at this time.

Question 13: Proposed Spectrum Fees: Provide your comments on the Commission's proposed "prime" and "non-prime" 700 MHz spectrum fees and the approach used to derive them. Please provide any alternative proposals you may have, with supporting rationale.

Digicel would simply refer the Commission to its original response where we called for a phased in approach to pricing 700MHz spectrum since we will also have to keep paying for GSM spectrum for some time to come.

Question 14: Spectrum Fee Survey Results: Provide your comments on the survey of 700 MHz spectrum fees included in Annex 3, including identifying any revisions and/or additions you consider appropriate with supporting references and explanations.

We should be grateful if the Commission could clarify what it has done in terms of calculating these fees. Are all fees calculated on a paired spectrum basis and has the Commission been able to verify that all the prices it has are based on paired spectrum? Clearly there would be inconsistencies otherwise.

Questions 15: Licence Conditions: Provide any comments you may have on the Commission's proposed 700 MHz licence (i) term, (ii) spectrum deployment and population coverage commitments and (iii) deployment commitment safeguard (and value). Please provide any alternative proposals you may have, with supporting rationale.

It is generally impractical to provide 100% population coverage short of hugely subsidising the last few per cent of coverage. We therefore suggest 95% or 98% at a maximum. If the Commission is still unconvinced of the need for this then we suggest that it asks for say 95% and says that the remaining coverage would have to be provided at its discretion having consulted with the radio engineers of the respective operators. This will provide the operators to demonstrate by means of detailed maps what the implications are of trying to reach for the very last few per cent of population coverage.

Questions 16: Implementation Process: Provide any comments you may have on the Commission's proposed "prime" 700 MHz spectrum licence comparative selection implementation process and timelines. Please provide any alternative proposals you may have, with supporting rationale.

No comments here.