



**CABLE & WIRELESS**

**RECEIVED**

8/15/08

DATE  
TCI TELECOMMUNICATIONS COMMISSION

Cable and Wireless (TCI) Ltd,  
PO Box 78, Leeward Highway  
Providenciales  
Turks & Caicos Islands  
British West Indies

Date 15 August 2008

Ref : CWTCI/ 01.93

Mr Bennett Stubbs  
Chairman  
Telecommunications Commission  
P.O. Box 203  
Business Solutions Office Complex  
Leeward Highway  
Providenciales  
Turks and Caicos Islands

Dear Mr Stubbs

**Re: TCITC Public Notice 2008-3 – Digicel Application for Use of Radio Spectrum in the 2.3 and 3.5 GHz Range**

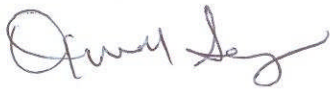
Cable and Wireless (TCI) Limited (“**C&W**”) is writing further to the above-referenced Public Notice issued on 16 July 2008. C&W’s comments will focus on the request by Digicel (TCI) Limited (“**Digicel**”) for 2.3 GHz spectrum, as C&W is addressing issues related to the 3.5 GHz range in its response to TCITC Public Notice 2008-1.

C&W notes that, according to Digicel’s 1 November 2007 letter, they are requesting all spectrum between 2305 MHz and 2360 MHz. This is patently unreasonable and clearly intended by Digicel to exclude other spectrum users (i.e., potential competitors) in the 2.3 GHz range. For example, the Federal Communications Commission in the United States has divided the same range into six (6) blocks of various sizes (for the Wireless Communications Service (WCS) and the Digital Audio Radio Service (DARS)).

Instead of assigning the entire range to Digicel, C&W suggests that the Commission divide the range into four or five blocks, and offer it to existing licensees and potential spectrum users, on terms similar to those being proposed for the spectrum in the 3.5 GHz range. This approach would ensure more than one party could provide services using that spectrum.

C&W thanks the Commission for this opportunity to comment on the requested assignment of spectrum in the 2.3 GHz band to Digicel. If you have any questions, please do not hesitate to contact me.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Drexwell Seymour". The signature is fluid and cursive, with the first name being the most prominent.

Drexwell Seymour  
Chief Executive

c.c. Hon. Jeffery Hall, Minister of Communications, Works and Utilities