

**CABLE & WIRELESS (TCI) LIMITED**  
RESPONSE TO

**National Table of Frequency Allocations  
Consultation Document**

By email to: [consultations@tcitelecommission.tc](mailto:consultations@tcitelecommission.tc)  
4 May 2021

## **I. Introduction**

1. Cable and Wireless (TCI) Limited, trading as “**Flow**” is pleased to provide the following comments to the Commission’s consultation document titled ‘*National Table of Frequency Allocations*’ (“**Consultation Document**”) published April 20, 2021.
2. Flow expressly states that failure to address any issue raised in this Consultation Document does not necessarily signify our agreement in whole or in part with the Commission’s position. Flow reserves the right to comment on any issue raised in the Consultation Document at a later date.

## **II. Context of Response**

3. Flow commends the Commission for taking the initiative to update the industry, and by extension the public, on the outcome of the World Radio Conferences (WRC), and how the outcome of the Conferences determines the spectrum available in the Turks & Caicos Islands (TCI) to facilitate the latest technological offerings to customers. Flow is pleased that the Commission is updating the NFAT because it tells the industry clearly and without contention, the spectrum resources available for assignment and gives the industry an opportunity to flag important issues for the Commission’s attention.
4. While TCI has a voice and a stake in the WRC deliberations, WRC decisions, even where they affect specific regions, are taken, collectively, by the whole world. Decisions at the WRC are under the auspices of the international framework for the use of the radio frequency spectrum set out in a global treaty – the Radio Regulations - ratified by the Member States of the International Telecommunication Union (ITU), a specialized UN agency. Within that international framework, countries manage their national use of the spectrum through establishing a National Frequency Allocation Table (NFAT) which sets out what radio services can use which frequency bands and under what conditions.
5. The foregoing has been established because Flow’s comments on the Commission’s questions in the Consultation Document are within the context of decisions arrived at under a global treaty which cannot be changed until there is another WRC, which is held every four

(4) years. Still, national authorities do have some limited ability to tailor the use of spectrum through the NFAT. Flow's responses will be limited to those aspects of the NFAT which are within the Commission's scope to affect.

6. Technology changes things. WRCs are driven by technological change. The history of the WRC will show that as technology develops, services are substituted, other grow in importance, and some disappear and there is the ever present need to preserve spectrum for non-commercial, public good services. Spectrum has to be identified for all. So truly, Flow does reserves the right to comment on any issue raised in this Consultation Document at a later date.

### III. Flow's Response to the Commission's Questions

7. Therefore, Flow's response to the Commission questions, having established the context is as follows:

#### *Commissions Questions*

**1. Please comment on the Turks and Caicos Islands NTFA, including the ITU Footnotes identified as applicable to the Turks and Caicos Islands.**

**2. Please comment on the separate Footnotes specific to the Turks and Caicos Islands.**

#### *Flow's Response*

8. With regards to:

T7 'Fixed wireless access systems, including WiMAX, may be licensed in the frequency range 3 400 - 3 600 MHz' and,

T8 'The bands 163 -173 MHz, 453 - 458 MHz, 3 480 - 3 500 MHz and 3580 - 3600 MHz have been identified for Public Safety and Government use. Additional bands may be included on an as needed basis.'

Flow notes that the 3400MHz-3600MHz spectrum range is one of the prime bands for 5G deployments around the world. Most recently, auctions 105 and 107 held by the FCC in United States, are a solid proof of this. For this reason, Flow recommends that T7 and T8 be modified to include use for mobile service/ IMT (broadband).

9. With regards to:

T13 'Licences for assignment of spectrum in the 2.5GHz Band (2500MHz - 2690MHz) contain the following conditions: 1/ The licensee must commercially deploy advanced LTE mobile broadband services within 18 months of the issuance of the spectrum licence. 2/ The licensee must cover 98% of the population of TCI with advance LTE-based mobile broadband services within 36 months of the issuance of the spectrum licence. 3/ The licensee must file an LTE mobile broadband service deployment status report with the Commission after 18 months, 36 months and every 2 years following the issuance of the spectrum licence. A cap of 40MHz bandwidth is established for assignments of spectrum to each applicant in the 2.5GHz band. FDD and TDD technology usage is permitted in accordance with the channel plan.

5G is now the guideline for new mobile spectrum band deployments. Flow recommends that the standard in T13 be revised to be 'LTE-Advance or higher mobile technologies'. This would allow TCI to secure state-of-the-art deployment in the band and also allow operators the option to deploy 5G in this band.

10. Flow also recommends an increase in the spectrum cap associated with this band. The band is 190MHz wide, there are only two (2) mobile operators in the country, therefore the existing cap of only 40MHz per operator is sub-optimal and should be increased.

### *Commission's Questions*

**3. Please indicate any additional frequency bands that could be identified in a Footnote for future public telecommunications services.**

**4. Please indicate any additional frequency bands that could be identified in a Footnote for licence exempt use.**

**5. Please indicate any specific frequency bands that could be identified for other uses.**

### *Flow's Response*

11. Technological development is the driver for spectrum allocation and assignment. Indication of additional frequency bands for future public telecommunications services, additional bands for licence exempt use and specific frequency bands for other uses predicated an ability to shift the global industry in these direction since decisions at WRC are global in nature.

12. The present reality is that Caribbean countries like TCI are technology takers so we don't actually set the agenda for the WRC but we do support those proposals that are progressive for the region. Through the Caribbean operators' trade association, CANTO, working with the Caribbean telecommunications Union (CTU) and CITELE (Inter-American Telecommunications Commission), regional regulators and governments are encouraged to support positions that are beneficial to the Caribbean region.

13. The CTU and CITELE are currently preparing for the next WRC which will be in November 2023. There is already a WRC-23 agenda which was decided on at WRC-19. As preparation for WRC -23 intensifies, Flow will be better able to advise the Commission on questions 3, 4 and 5. We note that and are pleased that the Commission is already participating in the CTU's Spectrum Harmonisation Committee and so is well on its way to also independently assessing the potential responses to these questions.

14. Again, Flow reserves its right to comment on these questions at a later date.

***Commission's Question***

**6. Please identify any additional frequency bands for which a band plan could be required.**

***Flow's Response***

15. Flow recommends a band plan for the following frequency bands:

- i. 3GPP band 71: 617MHz-652MHz + 663MHz-698MHz
- ii. 3GPP band 66: 1710MHz-1780MHz + 2110MHz-2200MHz
- iii. 3GPP band 78: 3300MHz-3800MHz

These band plans are recommended because of usage of these frequencies in the USA and other markets for 5G services.

#### **IV. Closing Remarks**

Flow thanks the Commission for the opportunity to participate in this Consultation. Kindly send any communication in relation to this Consultation Document to:

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**End Document**