

CABLE & WIRELESS (TCI) LIMITED
REPLY RESPONSE TO

**National Table of Frequency Allocations
Consultation Document**

By email to: consultations@tcitelecommission.tc
31 May 2021

I. Introduction

1. Cable and Wireless (TCI) Limited, trading as “**Flow**” is pleased to provide reply comments to Digicel’s response 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 or response to the Consultation Document does not necessarily signify our agreement in whole or in part with the Commission’s position or that of any respondent. Flow reserves the right to comment on any issue raised in the Consultation Document or response to the Consultation Document at a later date.

II. Flow’s Comments on Digicel’s Response

3. We do reference the following comment from Digicel’s response, dated May 11, 2021, to the Consultation Document:

Digicel’s Additional Comments

The following are Digicel’s further comments, specifically relating to the existing TCI Band Plans (par. 5):

- a. 5.1 – The Commission should consider reclassifying 700MHz Band 17 to Band 12 as Band 17 is already known to be a subset of Band 12. Reclassifying the allocation, therefore, would offer 2x5MHz of additional spectrum for public telecommunications services. The table below is provided for illustration purposes:

Band	Frequency (MHz)	Uplink (MHz)	Downlink (MHz)
12	700	699-716	729-746
17	700	704-716	734-746

Further, spectrum 699-704MHz/729-734MHz can also be utilised successfully to deliver LTE services.

4. Flow cannot agree with Digicel’s proposal. Flow in its response to the Consultation Document, at paragraph 15(i), recommends a band plan for band 71 (600MHz), which covers the range 617MHz-698MHz. Both Digicel’s and Flow’s proposal cannot co-exist since there would be interference between the bands. Flow’s proposal of a band plan for

band 71 is more beneficial to the industry because both Flow and Digicel could increase their spectrum holdings. In contrast, Digicel's proposal would only benefit Digicel without any benefit to other providers. The best solution is that which creates a benefit to the entire industry rather than a single operator. Flow trusts that the Commission will see the merits of Flow's proposal for a band plan for band 71, which benefits the entire industry.

III. Closing Remarks

Flow again 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