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**Wednesday, 2 June 2021**

Mr. Kenva Williams  
Director General  
Turks & Caicos Islands Telecommunications Commission (“**Commission**”)  
PO Box 203, Business Solutions Complex  
Leeward Highway, Providenciales  
**TURKS & CAICOS ISLANDS**

Dear Mr. Williams

**Re: Flow’s response to TCI’s NTFA Consultation Document:**

Please see below the comments below:

### **Chapter III. Flow’s Response to the Commission’s Questions**

Point 8. With regard 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).”

Digicel agrees with Flow’s position in relation to T7 and T8 as it relates to the spectrum 3400MHz-3600MHz being earmarked for future 5G deployments.

Point 9. With regard 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."

Digicel: Noted

Point 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."

[BR] Digicel agrees with Flow's position in relation to the lifting of the spectrum cap, as this will allow the operators to fully maximize the potential of 5G, which supports channel sizes up to 100MHz for this band.

Point 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 predicates an ability to shift the global industry in these direction since decisions at WRC are global in nature."

[BR] Noted.

Point 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."

[BR] Noted and agreed.

Point 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.”

[BR] Noted.

Point 14.

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

[BR] Noted.

Point 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.”

[BR] Digicel agrees with Flow on the bands suggested above. 3GPP Band 71 (n71) is being used to support 5G and would be a good candidate for offering a coverage layer for mobile 5G services. In our response, we also highlighted the introduction of band 66, which is the extension of Band 4 (currently used by Digicel in the market today to deliver mobile 4G LTE services). Band 66 can be used for 4G LTE services today and be evolved to manage 5G services in the future. Similarly, in our response, we previously highlighted the introduction of 3GPP band 78 (n78) to facilitate 5G services. Most of the commercially launched 5G networks today are using 3GPP band 78 (n78), so TCI’s adoption of this band would be in perfect alignment with global trends.



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**Mr. Addison Stoddard**  
Chief Executive Officer  
Digicel (TCI) Limited