

Islandcom thanks the Commission and appreciates the opportunity to respond to this 700-Mhz Consultative Document. We recognize the Commission's objective and role to ensuring a level playing field of effective competition within the Turks and Caicos Islands, and congratulate the Commission in this effort. However, as the Commission seeks to assign spectrum in a competitively neutral manner, it must remain cognizant of the total amount of spectrum each stakeholder is assigned.

Islandcom responds as follows:

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, IslandCom believes the adoption of the FCC 700 MHz spectrum plan is the best plan for the Turks and Caicos Islands.

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.

IslandCom believes this spectrum should be set aside for future use either as Public Safety spectrum or for commercial use.

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.

IslandCom agrees with the reservation of this spectrum for future Public Safety or commercial use.

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 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.

IslandCom is not aware of any commercial use of this spectrum at this time. IslandCom is not aware of any commercial wireless carriers at this time planning to deploy in this band. In

addition IslandCom is not aware of any infrastructure or terminal manufacturers building equipment for this band at this time.

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.

Interoperability and interference are the big issues surrounding band 12 (Lower A,B,C) versus band 17 (lower B, C). In the US lower block A is not usable due to interference from adjacent high power broadcast stations operating in lower block E. As a result equipment for lower block A will not be in high demand. Should the FCC, Wireless Industry, and Broadcasters resolve the lower block A interference and interoperability issues lower block A would become viable for commercial use in the Turks and Cacaos Islands. IslandCom does not believe lower block A by itself to be sufficient for LTE deployment.

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.

The unpaired lower D and E blocks by themselves would not serve the existing wireless carriers deploying FDD wireless systems. Certainly these two unpaired blocks could at a future date through carrier aggregation supplement down-link throughputs of existing LTE FDD systems should terminals be made to support such a deployment. The current attractiveness of these two unpaired spectrum blocks is very low compared to the Lower B,C and Upper C blocks. IslandCom is not aware of any immediate or near term uses of this spectrum in the Turks and Cacaos Islands.

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.

Yes, IslandCom agrees with this position.

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.

IslandCom agrees with option 2 as LTE requires a minimum of 2X10 MHz to deploy commercially at 700 Mhz. IslandCom also believes all three wireless carriers should be awarded the same aggregate amount of spectrum and total spectrum holdings should be taken into account.

Question 9: Spectrum for LTE Deployment Purposes: The Initial Consultation Document focussed 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.

LTE can and is being deployed in other frequency bands across the globe. The higher frequency bands are best suited for dense urban environments where capacity not coverage is the main design driver. In the Turks and Cacaos Islands with a light population density the lower bands provide the best economic model. Deploying LTE solely at the higher bands would be prohibitively expensive due to the number of sites needed to deploy in the Turks and Cacaos Islands. Certainly at a later date the higher frequency bands can be used to supplement capacity in targeted areas of high usage through carrier aggregation or small cell deployments.

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.

Both bands assigned to IslandCom 850 MHz and 1900 MHz can be used for LTE, but not at the expense of our existing UMTS and CDMA networks. IslandCom does not presently have enough bandwidth at 850 MHz or 1900 MHz to launch LTE service.

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.

A two stage selection process seems reasonable.

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.

We agree with all that the Commission indicated. However, while we agree with the important Commission points in this area, we want to stress the critical nature of looking at a carrier's track record in using spectrum efficiently and providing advanced services and technology when additional spectrum is allocated.

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.

Islandcom have no alternative proposals to offer.

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

Islandcom believes the spectrum fees are reasonable.

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

Islandcom believes the licence term should be in line with all other spectrum that is 15 years. Islandcom also believes that a build-out of a network in 18 months is indeed reasonable but that would be only for a 95% population coverage. Additionally, we do not think a performance bond is a necessary requirement as a safeguard.

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.

Islandcom have no further comments at this time.

Regards,



Niamh Blake, CEO

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