

UPGRADE TURKS & CAICOS

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TCI TELECOMMUNICATIONS COMMISSION
K.A.



5 June 2015

Mr. John Williams
Director General
TCI Telecommunications Commission
P.O Box 203
872 Business Solutions Building
Leeward Highway
Providenciales
Turks & Caicos Islands

Dear Mr. Williams,

Re: PN 2015-7 – Assignment of Spectrum and the 2.5 GHz Band

1. Cable and Wireless (TCI) Limited, trading as LIME ("**LIME**") thanks the Commission for this opportunity to respond to the comments filed by Digicel TCI Limited ("**Digicel**") on 29 May 2015 in the *Public Consultation on the Establishment of a Policy for Assignment of Spectrum in the 2.5GHz Band (2500MHz - 2690MHz)* issued on 7 May 2015 ("**the Consultation**"), and to the application by Andrew's Communications Limited ("**Andrews**") for 2.5 GHz spectrum included in Public Notice 2015-3 issued on 11 March 2015 ("**the Public Notice**"). LIME does not generally object to Digicel's comments, but would offer the following comments on them.

Choice of Band Plan

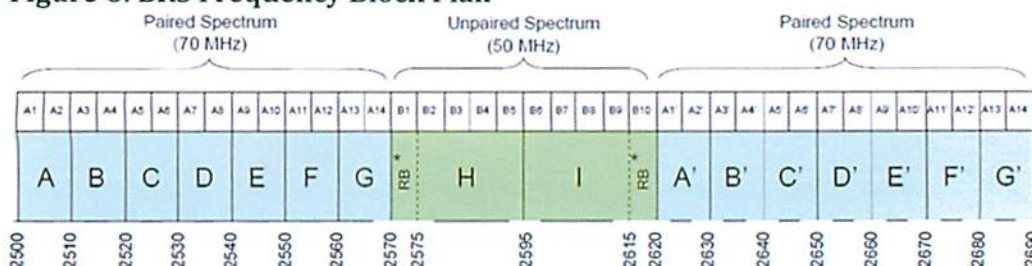
2. It is not entirely clear which of the two proposed band plans is supported by Digicel. LIME suspects it is Band Plan Model 2, based on Digicel's comments about 20 MHz blocks. Based on the request for 20 MHz blocks in the Public Notice, LIME believes Andrews would also support Band Plan Model 2. LIME recommends that, if the Commission adopts Band Plan Model 2, it should specify which blocks are to be paired and which are to be unpaired. LIME notes that this is how Industry Canada has set out their 2.5 GHz band plan.¹ A band plan which allows any given block to be paired with any other block is unlikely to be functional, as manufacturers are likely to develop devices that use very specific pairing of frequencies.

¹ See "Licensing Framework for Broadband Radio Service (BRS) — 2500 MHz Band", available at <http://www.ic.gc.ca/eic/site/smt-gst.nsf/eng/sf10726.html#p3.2>

Table 1 — BRS Frequency Blocks

Block	Frequencies	Total Spectrum	Pairing
A / A'	2500-2510 MHz / 2630 MHz	10 + 10 MHz	paired
B / B'	2510-2520 MHz / 2640 MHz	10 + 10 MHz	paired
C / C'	2520-2530 MHz / 2650 MHz	10 + 10 MHz	paired
D / D'	2530-2540 MHz / 2660 MHz	10 + 10 MHz	paired
E / E'	2540-2550 MHz / 2670 MHz	10 + 10 MHz	paired
F / F'	2550-2560 MHz / 2680 MHz	10 + 10 MHz	paired
G / G'	2560-2570 MHz / 2690 MHz	10 + 10 MHz	paired
H	2570-2595 MHz	25 MHz (includes 5 MHz restricted band)	unpaired
I	2595-2620 MHz	25 MHz (includes 5 MHz restricted band)	unpaired

Figure 6: BRS Frequency Block Plan



- It is also not clear whether, if the Commission were to adopt the Band Plan Model 1, it would also adopt the “Broadband Radio Service (BRS)” or “Educational Broadcasting Service (EBS)” designations used by the FCC. LIME recommends that the Commission not adopt the “EBS” designation, i.e. that the entire band be used for the “Broadband Radio Service” as it is, for example, in Canada. In this regard, we also agree with Digicel’s comments that the Commission should put emphasis on mobile applications when considering the band plan for the 2.5 GHz Band.

Size of Spectrum Award

- LIME views with concern the amount of spectrum being requested by Andrews (100 MHz) and in which Digicel is expressing interest (60 MHz). Assigning this amount is excessive and unnecessary and is unlikely in this particular case to be “optimal” for the Turks and Caicos Islands. It is also unclear how a 60 MHz or 100 MHz TDD spectrum assignment would fit into the 50 MHz set aside for TDD operations in the ITU and Canadian band plans or the 42

MHz set aside in the "middle band segment" of the FCC band plan. We note that Industry Canada has set a cap of 40 MHz for assignments in the 2.5 GHz band (with a few exceptions for the far North of the country).

Spectrum Fees

5. LIME agrees with Digicel that spectrum in the 2.5 GHz band should be priced at a discount to spectrum in lower bands. In this regard, the Commission should not adopt any price above US\$ 0.043 per MHz per pop. It may be more appropriate to price it at US\$ 0.039 per MHz per pop, to match the price of 850 and 900 spectrum.
6. LIME notes that the price for 1900 MHz spectrum is significantly higher than any other spectrum, and most importantly, than the highly-valued premium 700 MHz spectrum. It is so high, in fact, that the "average" price for spectrum ends up exceeding the price for premium spectrum. In our view, this is unacceptable and indefensible, and LIME recommends that the Commission begin immediately the process to re-align the fees for 1900 MHz spectrum so that they match the fees for functionally similar spectrum.


Reallocation of Frequencies

7. LIME notes the adoption of a new band plan for the 2.5 GHz band would amount to a reallocation of that band, and LIME notes the Commission's observations on prior assignments to LIME in the 2.5 GHz band. LIME is prepared to discuss with the Commission alternative assignments that would meet its needs. Those discussions would include, if applicable, the applicability of regulation 7 of the *Frequency Management Regulations*.

Conclusion

8. Should the Commission have any questions or concerns in respect of any of the foregoing, please feel free to contact the undersigned and we would be happy to meet to discuss the matter further.

Best Regards,



James Pitt
Country Manager