



CABLE & WIRELESS

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25 May 2007

Mr. David Archbold,
Managing Director,
Information and Communication Technology Authority,
3rd Floor Alissta Towers,
P.O. Box 2502GT,
Grand Cayman. KY1-1104

Dear Mr. Archbold:

Re: Policy for the Allocation of Spectrum – (CD 2007-1)

The following represents the submission of Cable and Wireless (Cayman Islands) Limited ("**C&W**") in response to the Public Consultation on Policy for the Allocation of Spectrum issued on 27 April 2007. In particular, C&W is responding to the Authority's questions at paragraph 9:

- a. Should the 5.8 GHz Band be covered by a Class Licence, making it available for use by anyone (subject to the normal interference and equipment standardization regulations)?
- b. Should spectrum, currently allocated on a non-exclusive basis under (e) of Table 1, be allocated on an exclusive basis?
- c. If so, should this apply only to selected bands or all bands?
- d. Should the decision on whether to allocate spectrum on an exclusive or non-exclusive basis depend upon intended usage or technology rather than spectrum band?
- e. If so, what type of usage or technology warrants an exclusive allocation?

- f. Do you believe that the Authority should publish a “spectrum map”?
- g. If so, what do you understand by the term “spectrum map”? Is it a list of uses to which spectrum band may be put, or is it a list of allocated and available spectrum? (It should be noted that details of allocated spectrum is already available from an examination of Licences which are published on the Authority's web site.)

Question A

Yes, the 5.8 GHz band should be covered by a Class Licence making it available for use by everyone, similar to the approach taken in the US market. This will make it easier on all users of the spectrum, as it is extremely difficult to regulate to the proliferation of devices in this band such as cordless phones. However, as new technologies such as WiMax continue to develop and new technologies emerge it may become necessary to assign part of the 5.8 GHz spectrum for exclusive use.

Question B

C&W submits that, overall, that spectrum should be allocated exclusively, but notes that whether spectrum should be allocated exclusively or non-exclusively will mainly depend on the type of spectrum and on the type of application that is expected to be used.

In particular, it would be best to have the frequency bands assigned for point to multi-point systems to be done on an exclusive basis. This is based on the experience of various licensees in the Cayman Islands with respect to WiMAX, the likelihood of these systems interfering with each other, and the difficulties in policing interference issues. However, this exclusive licensing arrangement should be implemented in a way that does not allow initial entrants for new technologies to capitalize on spectrum in a way that hinders other companies from providing the service in the future.

Questions C and D

Generally speaking, spectrum is a passive element that does not change. Technology and usage, on the other hand, change dynamically over time. C&W submits, therefore, that the decision to allocate spectrum exclusively or not should be based on how a particular band is used and the type of technology that will be available in the market.

Question E

Exclusive allocation is particularly warranted where the spectrum will be used to support “mass” offerings of public services where voice, data, and video will be household services for the public at large.

Questions F through G

C&W agrees that the Authority should definitely publish a “spectrum map”, as it will better and more efficiently present existing available information. Such a map should show how each spectrum band is used and by whom, in other words, include the uses for specific frequency bands, as well as information on allocated and available spectrum.

Please do not hesitate to contact me if you have any questions.

Yours faithfully,
Cable & Wireless (Cayman Islands) Ltd.

“Signed”

Rudy B. Ebanks
Chief Regulatory and Carrier Relations Officer

cc: Timothy Adam, Chief Executive C&W
Ian Tibbetts, Chief Operating Officer C&W
Frans Vandendries, Vice President Regulatory Affairs C&W
Albert Anderson, Vice President Network Services C&W