

Digicel

The Bigger, Better Network.

**Digicel's comments on the Public Consultation in respect of a Policy
for the Assignment of 700Mhz Spectrum in the Cayman Islands**

OCTOBER 2012

The succeeding comments are not exhaustive and Digicel's decision not to respond to any particular issue raised in the Consultation Document or any party does not necessarily represent agreement, in whole or in part with the Authority or other parties on these issues; nor does any position taken by Digicel in this document mean a waiver of any sort of Digicel's rights in any way. Digicel expressly reserves all its rights.

Thank you for inviting Digicel to provide its reply comments on this consultation and of course we are available for any questions you may have.

a. Should the Authority use the FCC spectrum allocation model for the 700 MHz spectrum in the Cayman Islands?

Answer: Yes

In order to achieve the first of these objectives the Cayman Islands must adopt a channelization plan which is consistent with the plan in the United States. This is because LTE handsets are, and equipment is, being manufactured in mass quantities for the US market. As a consequence, if the Cayman and US band plans are consistent it will reduce the price at which handsets and equipment could be obtained to build a network and sell handsets to consumers in the Cayman Islands. It will also enable roaming to take place.

The US band plan is as the Authority knows consistent with the 3G PP bands which are as follows:

Band 12

698 – 716MHz and 728 – 746 MHz

Band 13

777 – 787 MHz and 746 – 756 MHz

Band 14

788 – 798 MHz and 758 – 768 MHz

Band 17

704 – 716 MHz and 734 – 746 MHz

The US allocations fit within these bands.

b. Should the Authority limit the maximum bandwidth allocation to 12 MHz (paired) at this time?

*Answer: No. Digicel feels that the allocation of bandwidth within the 700MHz spectrum should be based on the types of services and products that each operator will be rolling out as part of launch of LTE services. Splitting up the bandwidth so that there is a limit of 12*2*

MHz in our view undermines its usefulness. As indicated, the starting point should be the FCC band plan so that handsets and equipment made for the US market can be used in the Cayman Islands and within and across the entirety of each operator's frequency band allocation.

c. Is 60 days an appropriate amount of time to accept applications for the initial assignment of this spectrum upon conclusion of this consultation proceeding?

Answer: Digicel suggests that 90 days would be more appropriate.

d. Is it appropriate for the Authority to make a decision on multiple applications applying for similar or conflicting bands by holding an applicant 'beauty contest'?

Answer: Yes, Provided that the criteria that will be used to analyse the responses are consulted on first and subsequently published and provided to all prospective applicants at least 90 days prior to the date for the applications.

e. Are there any other comments relevant to this consultation and if so what are they?

Answer: No