

**RESPONSE**  
**TO**  
**A POLICY FOR ASSIGNMENT OF 700 MHz SPECTRUM - FINAL**  
(Ref: CD2012-2)

**LIME**

Landline | Internet | Mobile | Entertainment

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## **I. Introduction**

1. Cable and Wireless (Cayman Islands) Limited, trading as LIME (“**LIME**”), is pleased to provide the following responses to the Authority’s consultation document titled ‘*A Policy for the Assignment of 700 MHz Spectrum - Final*’ (the consultative document) published 27 September 2012.

2. LIME’s response to this consultative document is to be read in conjunction with LIME’s responses to the previous two (2) consultative documents on this matter.

3. LIME expressly states that failure to address any issue raised in this consultative document does not necessarily signify its agreement in whole or in part with the Authority’s position. LIME reserves the right to comment on any issue raised in the consultation at a later date.

## **II. Response to Questions**

4. The Authority asks five (5) questions, in the consultation document, which LIME responds to as follows:

***Question 1: Should the Authority use the FCC spectrum allocation model for the 700 MHz spectrum in the Cayman Islands?***

### **LIME’s Response**

5. LIME did recommend and agrees that the Cayman Islands adopt the FCC spectrum allocation model for 700 MHz spectrum.

**Question 2: Should the Authority limit the maximum bandwidth allocation to 12MHz (paired) at this time?**

**LIME's Response**

6. LIME is not exactly sure if by "12 MHz paired" the ICTA means 12MHz + 12 MHz for a total of 24 MHz, or 6 MHz + 6MHz for a total of 12 MHz. If it is the former, then LIME believes that it would not be unreasonable to limit the allocation, at least initially. However, if it is the latter, service quality for LTE services is likely to be poor, notwithstanding similar assignments to US carriers. Accordingly LIME does not agree that the maximum amount of spectrum assigned initially should be 6MHz x 6MHz paired for a total of 12 MHz but rather that this should be the minimum.

7. To the best of LIME's knowledge, AT&T has deployed in its assigned 2 x 12MHz band (Band 17 – 2 x 10MHz LTE Profile with 1MHz Guard Bands). This amount of spectrum appears however to be insufficient to satisfy demand so AT&T is also planning deployments in other spectrum bands with the same technology.

8. There has to be a recognition that a service provider will require an allocation of at least 2 x10MHz blocks (paired spectrum for FDD operation) to operate two (2) carriers which must be considered a base requirement for successful deployment of service. Because the FCC spectrum allocation model relies on increments of 6MHz, this operational requirement means the Authority would need to assign 2 x 12MHz to a service provider. Otherwise service quality will not meet the public's expectations and the Cayman Islands will not enjoy all the benefits of the deployment of services in the 700MHz band.

**Question 3: Is 60 days an appropriate amount of time to accept applications for the initial assignment of this spectrum upon conclusion of this consultation proceeding?**

**LIME's Response**

9. In LIME's view, sixty (60) days is sufficient time for the preparation and submission of applications for 700 MHz spectrum, subsequent to a Decision by the ICTA.

**Question 4: 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'?**

**LIME's Response**

10. LIME agrees that a 'Beauty Contest' is appropriate, where there are multiple applications for the same 700 MHz spectrum bands. As indicated in its response to the previous consultation document, the rules for the 'Beauty Contest' must be transparent and available ahead of time. Accordingly these rules should be issued before applications are required. Indeed, operators should have an opportunity to comment on the rules for the Beauty Contest.

11. Even so, and without prejudice to LIME's spectrum requirements, LIME is of the view that each service provider who applies for spectrum in the 700 MHz block should be allotted the minimum amount of spectrum assigned by the Authority, which LIME proposes should be 2x12MHz. The beauty contest can subsequently be used as a tool to determine which operators are assigned additional spectrum.

### **III. Closing Remarks**

12. LIME thanks the Authority for the opportunity to participate in the consultation.

Kindly send any communication in relation to this consultation to:

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