



The Bigger, Better Network.

Cayman Financial Centre  
36A Dr. Roys Drive  
PO Box 700 GT  
Grand Cayman, Cayman Islands  
Tel: + 1 345 623 3444  
Fax: + 1 345 623 3329

May 29, 2009

Mr. David Archbold  
Managing Director  
Information, Communication & Technology Authority  
P.O. Box 2502  
3<sup>rd</sup> Floor Alissta Towers  
Grand Cayman  
KY1-1104

Dear Mr. Archbold,

**Re: Public Consultation on a Policy for the Assignment of 700 MHz Spectrum**

Digicel is pleased to comment on the ICTA's proposed policy for the assignment and allocation of spectrum in the 700 MHz. Please find Digicel's comments and responses to the questions in the following pages.

We reserve the right to respond to any comments raised on account of our answers submitted herein.

Digicel reserves the right to comment on any issue raised as part of the consultation process at a later date.

**Question 1**

***Do you agree that the 700 MHz spectrum should be channelized in the Cayman Islands based on 18 channels of 6 MHz?***

Digicel does not have any objections to the allocation of 700 MHz based on the proposal to split the band in eighteen (18) 6 MHz channels.

**Question 2**

***Do you agree that the number of 6 MHz channels to be assigned by the Authority to each operator should be left to the discretion of the Authority after consideration of the operators' business and technical proposals?***

Digicel would recommend that the spectrum in the 700MHz band be assigned by the Authority. However, the Authority when making a decision on allocation should consider where possible the operator's history of service deployment in the Cayman Islands in addition to their business and technical proposal related to the 700MHz band.

**Directors:** Denis O'Brien (Chairman), Michael Alberga, Leslie Buckley, Conor O'Dea

Based on research and analysis of the types of services and products that will be deployed using 700MHz Digicel will require four (4) blocks of contiguous spectrum (4x6 MHz). The 4 channels will provide sufficient bandwidth necessary to introduce new wireless products.

### Question 3

***Do you consider that it is appropriate to reserve four channels (24 MHz) of the 700 MHz for use by public safety agencies and four channels (24 MHz) for future use?***

Digicel agrees in principal with the concept to reserve a certain amount of bandwidth for future use and public safety however, these reserved bands should not be left unutilized for extended periods. A set timeline should be agreed in terms of when the frequency should be used. If the frequency is not allocated and utilized within the agreed timeline, it should then be reassigned to operators that are operational and that require additional spectrum.

### Question 4

***Do you agree that the traditional first come, first served method of assigning spectrum in the Cayman Islands is not appropriate in the case of the 700 MHz spectrum? If yes, do you agree that it would be preferable to use comparative selection method?***

Digicel's recommendation is that the spectrum should be assigned on a first come first served basis but that the selection should be done to ensure that companies that are currently successfully operational in this market be given preference during the spectrum allocation process.

Digicel looks forward to additional participation in developing the regulatory framework related to the allocation and management of the 700 MHz spectrum.

Yours truly,  
Digicel (Cayman) Limited



Victor Corcoran  
Chief Executive Officer