



AVIATION COMMUNICATIONS LIMITED

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July 13, 2007

Mr. David Archibald
Managing Director,
Information Communication Technology Authority
3rd Floor Alissta Towers
North Sound Way
Grand Cayman
Cayman Islands

Dear Mr. Archibald,

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

The following is UNITEL/AVCOM LTD response to request for comment on "Policy for the Allocation of Spectrum".

- 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)?

Yes, this band should be made available to everyone. There is no need to buck the trend, and the trend is definitely in favour of having this band as unlicensed spectrum. Equipment is being manufactured everywhere to operate within this spectrum band, and the thinking is that these will operate in unlicensed spectrum. These equipment are therefore readily available, and the Authority would have great difficulty in managing any policy that would require their licensing.

Further, it is our opinion that ICTA's policies should be developed with a view to promoting:

- More efficient and creative use of the spectrum
- The enabling of cost effective and innovative technologies, and
- Competition and the creation of new business opportunities in the delivery of wireless technologies and services.

We think that opening up the 5.8 GHz Band would be a move in the right direction to promoting these ideals.



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We also propose the following arrangements for radio frequency management in this spectrum once it becomes licence-exempt.

- Low powered radio communication devices may be operated in the band on a no-interference, no-protection basis. They may not cause radio interference and cannot claim protection from interference.
- No licence fee will be required for operation in licence-exempt spectrum.
- Radio Systems may operate within the band 5.725- 5.850 GHz. with a maximum power level of 0.75Watts and a minimum bandwidth of 1 MHz.
- Radio Systems with design specifications which conform to the technical conditions as stated herein, will not be the subject of individual licences, but must satisfy the requirements for type approval as established by the ICTA.

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 on 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?

In general, we do not think that spectrum should be assigned on an exclusive basis. Technology continues to change and throw up innovative solutions, and assignment of spectrum should also give due consideration to this.

Indeed, we are of the view that allocation of spectrum should be more dependent upon usage or technology rather than on spectrum band. Thus, while we do not think that assignment of spectrum in general ought to be exclusive, we would support allocation on an exclusive basis, if say, for example, someone wishes to deploy a network across the islands. It should, however, also be noted that some technologies actually allow the re-use of the spectrum band while limiting interference. This, then, should also be taken into consideration.

There is also the issue of spectrum already allocated, especially in the so-called "premium bands". Invariably, the services offered in these bands will require operators to have exclusivity to their assigned segment within a particular band. The advent of WiMax and the proliferation of manufactured equipment in the 3.5 GHz band, for example, almost certainly means that, for all intent and purpose, this band will be accommodating multiple operators who will have to be issued exclusive segments within the Band.



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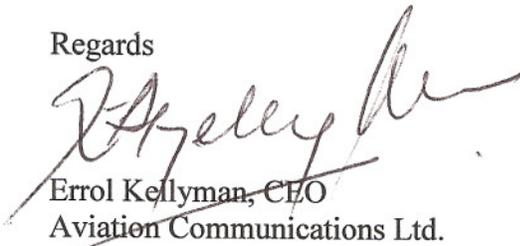
- f. Do you believe that the Authority should publish a "spectrum map"?
- g. If so, what do you understand by the term "spectrum map"? Is it a list of uses to which spectrum band may be put, or is it a list of allocated and available spectrum? (It should be noted that details of allocated spectrum is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

Most definitely! We certainly believe that the Authority should publish a Spectrum Map.

This Spectrum Map should both list the uses to which the spectrum band may be put, as well as provide clear guide on the assignment (allocation) of spectrum. It would then also, by the same token, provide information on spectrum availability/non-availability.

Despite the fact that details of allocated spectrum are already available from an examination of Licences on the ICTA web site, it still makes a lot of sense to have a Spectrum Map as described above. Having all the information in one document is more elegant, makes for greater efficacy, and obviates the need for the interested party having to undertake the rather onerous task of piecing things together.

Regards


Errol Kellyman, CEO
Aviation Communications Ltd.

cc: Howard Cross, AVCOM Ltd.
Dr. Patrick Dallas, UNITEL