

Hello.

www.time4lime.com

2 - 6 Carlton Crescent
Kingston 10
Jamaica, W.I.

P: 876 926 9700
F: 876 968 9696

LIME

May 29, 2009

BY EMAIL TO: consultation@ectel.int

Managing Director
ECTEL
P.O. Box 1886
Vide Boutielle
CASTRIES
St. Lucia

Dear Sirs:

Re: **Policy for the Allocation and Assignment of frequencies in the 700 MHz band
Consultation Document**

Further to its response to the captioned dated January 20, 2009 and February 18, 2009 Cable & Wireless, trading as LIME, writes to advise ECTEL that it has revised its position on the channelization of the 700 MHz spectrum based on additional information that has become available to the Company.

LIME believes that affordable Customer Premises Equipment (CPE) will be very important in the success of the service (s) offered using 700 MHz spectrum. By aligning the channelization of the spectrum with the USA, it can be expected that affordable CPE will be readily available within ECTEL countries. The continued use of the traditional channelization of 18 channels of 6 MHz could result in more expensive equipment because of the need to adjust equipment or even worse the need to acquire specialist CPE. This could also delay the time -to -market of services. LIME is of the view that the success of any service offered using the 700 MHz spectrum will be based on

affordable CPE which LIME believes will be delivered by adopting the US standard. It is for this reason that LIME believes that harmonizing with the channelization in the USA is best.

In this regard, there has to be a recognition that a service provider will have to be assigned 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. LIME considers that an assignment of 4x10 MHz blocks would provide the Company with the capability to provide an ideal service offering to its customers

Because the technology used in the 700 MHz block is LTE, splitting the spectrum into 6MHz blocks is inefficient. LTE uses 5MHz blocks of spectrum, which means that in each 6MHz assignment, 1 MHz of assignment will be unusable and in the case of LTE no guardband is required. This would be a wasteful way of segmenting this very valuable frequency and it should be avoided at all costs. Although not recommended, should ECTEL favour staying closer to the traditional channelisation of the 700 MHz spectrum, LIME proposes that the band be segmented into 5MHz blocks rather than the proposed 6MHz scheme.

LIME regrets any inconvenience that may have been caused by the revision of its views on the channelization of the 700 MHz spectrum. LIME assures ECTEL that it is committed to working with ECTEL and the telecommunications industry in establishing the framework for the allocation, assignment and governance of the 700 MHz spectrum.

Please send any communication in relation to this consultation to Melesia Sutherland Campbell at melesia.Campbell@time4lime.com and Mr. Frans Vandendries at frans.vandendries@time4lime.com.

Yours sincerely,



MELESIA SUTHELAND CAMPBELL
Regulatory Advisory
Legal, Regulatory & Corporate Affairs