



Cayman Corporate Centre, 4th Floor, Hospital Road
P.O. Box 704 GT, Grand Cayman, Cayman Islands
Tel: (345) 769.1000 • Fax: (345) 769.0999
www.telecayman.com

June 29th, 2007

Mr. David Archibold
Information & Communications Technology Authority,
85 North Sound Way, Alissta Towers,
Grand Cayman, Cayman Islands

Dear Mr. Archibold,

RE: POLICY FOR THE ALLOCATION OF SPECTRUM – (CD-2007-1)

Introduction

The purpose of this letter is to provide submissions on behalf of TeleCayman Limited (“TeleCayman”) in response to the Public Consultation on Policy for the Allocation of Spectrum issued on April 27th 2007.

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TeleCayman therefore respectfully submits that it is in the best interests of the telecommunications industry as a whole for all frequencies that are allocated to licensed entities to be assigned to such entities on an exclusive basis.

Detailed Reasons for Submission

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Specific Questions Raised

TeleCayman's comments on the specific areas outlined in the public consultation document are, adopting the numbering therein, as follows:

- a) It is TeleCayman's opinion that 5.8GHz band should be allocated to entities that currently have an ICTA license. Currently private companies are allowed to purchase and operate equipment in the 5.8GHz band for their own private networks. As set out above this has introduced significant interference problems for point-multipoint systems that licensed ICTA providers use resulting in this frequency becoming unusable for licensed service providers. It is our respectful submission that the ICTA should seek to regulate the 5.8GHz spectrum so that only licensed ICTA providers may use it.
- b) Yes. TeleCayman has always advocated that the availability of the frequencies outside of the "free spectrum bands" should be assigned on an exclusive basis. Due to the fact that these systems can support point to multipoint services and given that such point to multipoint services can only operate properly where there is minimal interference, it is imperative that the spectrum be assigned on an exclusive basis only.
- c) In addition to the bands assigned in section (d) in table 1, TeleCayman would also recommend that consideration should be given to also assigning the following bands on an exclusive basis:
 1. 3.5GHz
 2. 7 GHz
 3. 10.5 GHz
 4. 23 GHZ
- d) In TeleCayman's opinion it should be based not on intended use or technology but on the Spectrum band itself. Manufactures have developed equipment that provide a multiplicity of services in all available bands so it's impossible to assigned exclusivity purely on intended use.
- e) See answer to (d)
- f) Yes. The ICTA should develop a spectrum database showing all users of spectrum whether they are licensed or unlicensed entities. This will allow licensed entities and the industry as a whole to better operate under the "good neighbor policy". It is very important that all users of the spectrum band are aware of the spectrum that is in use as well as the entities using them. In addition to the spectrum map the ICTA should also regulate the power output of the equipment to ensure that the power levels are within an acceptable level so as not create interference problems in adjacent bands. TeleCayman has conducted research on

this particular issue and has concluded that the majority of countries have developed and maintain a spectrum allocation database.

- g) TeleCayman's opinion is that the Spectrum allocation sheet should list all assigned bands, sub bands and the licensed entity that has been assigned the spectrum. The spectrum allocation list should also contain un-assigned frequency bands as well.

Conclusion

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Please feel free to contact me directly should you have any questions.

Yours sincerely,



Raul Nicholson-Coe
President and COO