



Mr. David Archbold  
Information & Communications Technology Authority  
PO Box 2502GT  
Grand Cayman  
Cayman Islands

11 July 2007

Dear Mr. Archbold,

This letter is WestTel's submission to the public consultation, **CD 2007-1, Policy for the Allocation of Spectrum** published by the Information and Communication Technology Authority on the 27th of April, 2007.

As a license holder and operator of several wireless networks within the Cayman Islands, WestTel has an active interest in regulatory matters as they pertain to the issuing and management of radio spectrum. WestTel favors any regulations which will foster competition, promote efficient use of spectrum and facilitate new wireless service offerings.

During the last few years the Cayman Islands has seen a tremendous growth in the number of wireless networks providing broadband services in Cayman. Broadband wireless systems tend to require high frequency reuse, have wide RF propagation and be sensitive to RF interference. From an investment perspective, wireless broadband networks are approaching cellular networks in cost and complexity.

WestTel does not believe that the current regulatory framework, as it relates to frequency allocation, provides adequate support of wireless broadband services. This has led to instances of interference and other technical issues which ultimately hurt both the industry and the consumer.

WestTel recommends that the Authority define a new exclusive allocation for broadband wireless networks. The service definition should encompass all current and emerging broadband wireless technologies, including, but not restricted to; WiMax, AWS, EVDO, 3G, and 4G. WestTel does not believe that it would be in the best interest of the Authority to limit the frequency ranges for broadband wireless networks. Neither the industry nor foreign regulatory bodies have standardized on the frequency ranges for use with these emerging technologies.



If the Authority were to provide exclusive allocations for broadband wireless networks, WestTel believes that these allocations should be presented for industry comment before allocation is approved. Additionally, there should be provisions to ensure that allocated frequencies are in fact being used by the carrier. This could be managed through the matching of tax receipts to allocation or identifying frequency usage as a part of the licensee disclosures to the Authority.

As part of managing the spectrum, the Authority should actively track and manage frequency allocations. As a part of this responsibility, it would be extremely helpful for the authority to maintain a spectrum map. This would help the authority maintain a list of allocated spectrum and would assist in avoiding cross allocations. Whether the authority maintains this list for internal use or published for public and/or industry consumption is not of concern to WestTel.

Yours sincerely

A handwritten signature in black ink, appearing to read "M Edenholm". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

**Michael Edenholm**  
**Chief Executive Officer**