

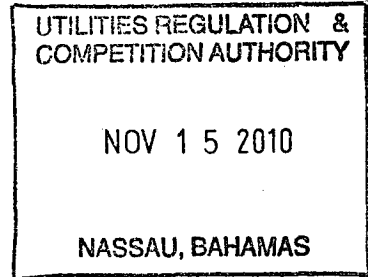
Hi-Technology Communications

2-WAY MOBILE TRUNKING SERVICE
PROVIDER

October 28, 2010

The Utilities Regulation and Competition Authority (URCA)
UBS Annex Building,
East Bay Street

Attn : Mr. Usman Saadat (Chief Executive Officer)



Re : Consultation for Opening New Spectrum Bands

Dear Sir ,

I Mark Gibson Sr. President and CTO of Hi-Technology Communications, hereby submit my opinion as it relates to URCA's proposal to open the 700 MHz spectrum. I have answered all questions as set out by URCA in consultation and they are as follow:

- 1) I agree with URCA 's proposal of factors used to consider when it initiates the process to open new spectrum band upon its own volition open new spectrum bands
- 2) Yes, I agree that URCA consider specific demands from the industry.
- 3) I agree that URCA 's proposal that licensees should only be awarded an optimum amount of spectrum licenses for services to be provided in a territory.
- 4) I Ultimately agree that URCA should **not award** the entire capacity of a spectrum band to a single operator . **Under no Conditions**

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- 5) Yes, I agree with URCA 's proposal on the information to be provided when requesting a new band to be opened.
- 6) Yes, I agree with URCA's proposal on guidelines on how to configure and open a new spectrum band and award licenses.
- 7) Yes , I agree with URCA proposal to split the 700 MHz band into lower and an upper band as discussed.
- 8) No , I don't agree that URCA proposal for the 700 MHz upper band should be reserve for future use. My reason for this is because not only broadband services can be offered in the 700 MHz band , but also wireless digital TV Services. In planning for DTV services, spectrum may be needed in both bands in order to provide continuity of operating frequency .
- 9) Yes , I agree with the proposal to maintain a 6 MHz RF channel structure in the 700 MHz spectrum band.
- 10) I agree with URCA propose interim pricing for the 700 MHz band

Expression of Interest # 1

I am in agreement for the use of the 700 MHz spectrum band for broadband fixed services, taking into consideration that Wireless DTV uses the same band, It is my opinion that URCA carefully assign each band upper and lower reasonably to accommodate both Broadband services and DTV services.

URCA should properly separate frequency for broadband services and for DTV **maybe using the lower band for broadband only and the upper band strictly for DTV Services or vice versa**. This way interference will be reduce between the two technologies.

I hope that my opinion given above help in URCA in its evaluation to open the 700 MHz band.

Yours Sincerely,


Mark Gibson

President / CTO