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20<sup>th</sup> February 2012

Mrs. Kathleen Riviere-Smith  
Director Policy and Regulation  
Utilities Regulation and Competition Authority  
UBS Annex Building  
East Bay Street  
Nassau, The Bahamas

Dear Mrs. Smith,

**Re: ECS 1/2012 – Draft Policy for New Spectrum Bands – 700 MHz, 11GHz, 12 GHz and 42GHz**

Please find IPSI's response to ECS1/2012 as follows:

Consultation Question 1

Do you agree with URCA's proposal for interim pricing of newly opened standard spectrum bands? Please provide detailed reasons for your response, including if appropriate, alternate proposals.

**IPSI's response:**

**Based on bandwidth requirements for IPSI's broadband technology, and for assignment of spectrum in the 11GHz, 12GHz and 40GHz, we believe that URCA's interim pricing proposal is reasonable and in line with international standards for jurisdictions of the size of The Bahamas' addressable population.**

**The proposed interim pricing for 700 MHz at \$8000 per MHz for public access is reasonable for paired frequencies between 704 MHz to 787 MHz because of the higher availability of CPE chip sets worldwide being manufactured for those frequencies. Any allocation of frequencies outside those frequency bands in the 700 MHz spectrum we believe is unreasonable because**



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of the unlikely availability of CPE chip sets and should be priced more in line with the proposed pricing of the 12 GHz spectrum band.

#### Consultation Question 2

Do you agree with URCA's approach to the geographical categories for licensing of newly opened spectrum bands? Please provide detailed reasons for your response, including if appropriate.

#### IPSI's response:

IPSI's agrees with URCA's proposal to "nationalize" the geographic licence for spectrum on the basis that URCA will allow ISL a reasonable time from to allow for the deployment of services in those geographic areas throughout the country as indicated in URCA's proposed schedule.

#### Consultation Question 3

Do you agree with URCA's proposal for licensing the 700 MHz band?

#### IPSI's response:

Although IPSI acknowledges that certain blocks of spectrum is reserved for mobile operators only, for reasons we presented before regarding the chip sets, IPSI proposes to provide Fixed Wireless Terminal (FWT) services which require chip sets that are manufactured in frequencies using the spectrum in blocks B,B',E,E'F' and F' reserved for mobile operators only. IPSI therefore disagrees with URCA's proposal for licensing in the 700 MHz band for mobile



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**operators only as other operators will require use of those frequency blocks for non-mobile services such as Fixed Wireless Terminals (FWT).**

**IPSI further expresses its concerns that BTC still allowed to reserve all the "prime" spectrum in the 700 MHz in its monopoly as the Bahamas' only mobile operator to the disadvantage of OLOs.**

Consultation Questions 4-6

**IPSI's Response:**

**IPSI is in full agreement with URCA's proposal as expressed in questions 4,5 and 6 with regards the packaging, licensing and pricing for the 11GHz, 12GHz and 42GHz spectrum bands.**

Yours sincerely,  
**IP Solutions International, Ltd.**

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