



# **National Spectrum Plan (2026 – 2029)**

**Statement of Results and Final Decision**

**ECS 05/2026**

**Issue Date: 06 May 2026**

# Table of Contents

1. Introduction .....	3
1.1. Legal and Regulatory Framework.....	4
1.2. Structure and Remainder of this Document .....	6
2. Responses to the Consultation .....	6
2.1 General Comments .....	6
2.2 Consultation Questions and Responses .....	14
3. Conclusion and Final Decision.....	33

## 1. Introduction

In this document, the Utilities Regulation and Competition Authority (“URCA”) issues its Statement of Results and Final Decision with respect to URCA’s Public Consultation entitled “*National Spectrum Plan (“NSP”) 2026-2029*”<sup>1</sup>.

URCA published the Consultation Document on its proposed revisions to the NSP on 13 June 2025, with responses due on 14 July 2025. The objective of the consultation process was to allow URCA to gather input from stakeholders on key regulatory measures on proposed revisions to the NSP. To achieve this, URCA’s Consultation Document on the revisions to the NSP set out, amongst other things, the following:

- (i) URCA’s objectives and legal and regulatory framework for the public consultation;
- (ii) URCA’s review of current NSP in the Bahamian Electronic Communications Sector (“ECS”) and URCA’s amendments to the previous NSP based on International Telecommunications Union (ITU) policy updates, local conditions and local stakeholder input;
- (iii) The rationale for URCA’s proposed revisions to the NSP;
- (iv) Consultation questions (“Consultation Questions”); and
- (v) Presentation of the revised draft NSP.

URCA received written responses to the Consultation Document from the following persons (collectively “the Respondents”):

- (i) Anonymous Respondent (“Anonymous Respondent”);
- (ii) A joint response from Cable Bahamas Limited (“the CBL Group”) and Be Aliv Limited (“Aliv”) (hereinafter collectively referred to as “the CBL Group Group”);
- (iii) Bahamas Telecommunications Company Limited (“BTC”); and
- (iv) Kuiper Systems LLC (“Kuiper”).

URCA thanks the Respondents for their written responses and participation in the consultation process and encourages additional participation by all stakeholders going forward. URCA notes that all comments received have been carefully considered by URCA.

---

<sup>1</sup> <https://urcabahamas.bs/wp-content/uploads/2025/06/URCA-ESC-052025-DRAFT-NATIONAL-SPECTRUM-PLAN-CONSULTATION-DOCUMENT.pdf>

In this document, URCA replies to the comments it has received from the Respondents and sets out its Final Decision with respect to the proposed revisions to the NSP. In doing so, URCA expressly states that failure on its part to respond in this document to any comment made by any of the Respondents does not necessarily signify URCA's agreement in whole or in part with such comment, that URCA has not considered such comment, or that URCA considers the comment immaterial or without merit.

## **1.1. Legal and Regulatory Framework**

This subsection sets out the legal and regulatory framework that governs URCA's power to conduct this consultation process.

### Relevant Provisions of the Communications Act, 2009

Section 4 of the Communications Act, 2009 ("Comms Act") provides, *inter alia*, that the electronic communications policy has as one of its main objectives, to further the interest of persons in The Bahamas in relation to the ECS by promoting affordable access to high-quality networks and carriage services in all regions of The Bahamas.

Section 5 of the Comms Act states:

*"All policy measures, decisions, and laws to take effect in the electronic communications sector in The Bahamas shall be made with a view to implementing the electronic communications policy objectives and shall comply with the following guidelines –*

- (a) market forces shall be relied upon as much as possible as the means of achieving the electronic communications policy objectives;*
- (b) regulatory and other measures shall be introduced –*
  - (i) where in the view of URCA market forces are unlikely to achieve the electronic communications policy objective within a reasonable time frame, and*
  - (ii) having due regard to the costs and implications of those regulatory and other measures on affected parties;*
- (c) regulatory and other measures shall be efficient and proportionate to their purpose and introduced in a manner that is transparent, fair, and non-discriminatory; and*
- (d) regulatory and other measures that introduce or amend a significant government policy or regulatory measure (including, but not limited to, the sector policy) –*
  - (i) shall specify the electronic communications policy objective that is advanced by the policy or measure; and*

*(ii) shall demonstrate compliance with the guidelines set out in paragraphs (a), (b) and (c).*

Section 11 of the Comms Act requires URCA to allow persons with sufficient interest a reasonable opportunity to comment on a proposed regulatory measure which, in the opinion of URCA:

- (i) is of public significance; or
  - (ii) whose rights or interests may be materially adversely affected or prejudiced by the proposed regulatory measure.
- (i) Section 13 of the Comms Act establishes that a regulatory measure is likely to be of public significance if it relates to a regulated sector and can lead to: a major change in the activities carried out by URCA under the Comms Act or any other enactment;
- (ii) a significant impact on persons carrying out activities in a regulated sector; and/or
  - (iii) significant impact on the general public of The Bahamas or in any part of The Bahamas.

Section 31 of the Comms Act outlines URCA's duties concerning the publication and revision of the NSP as follows:

*"31(1) URCA shall publish the spectrum plan approved in accordance with subsection (5) or subsection (6).*

*(2) The spectrum plan shall be consistent with any applicable international treaties, commitments or standards, including, without limitation, those of the International Telecommunications Union and shall take into account relevant international recommendations.*

*(3) The spectrum plan shall specify those frequency bands that are premium spectrum bands for the purposes of section 30.*

*(4) Within three years of each publication of a spectrum plan under subsection (1), URCA shall formulate, in consultation with the Minister, and submit a revised spectrum plan to the Minister.*

*(5) The Minister may approve or amend the proposed spectrum plan within forty-five calendar days of submission by URCA.*

*(6) If the Minister does not approve or amend the spectrum plan within the time period specified in subsection (5), URCA will publish the spectrum plan for the purposes of subsection (1)."*

Additionally, section 34(2) of the Comms Act requires URCA to conduct public inquiries and consult with electronic communications service providers and network operators in The Bahamas about the use and management of radio spectrum.

URCA, therefore, considers that the cumulative effect of the foregoing statutory provisions required URCA to publish the Consultation Document for public consultation to provide an opportunity for all interested persons to submit written comments to URCA on the Consultation Questions and/or any other matter contained in or relevant to the NSP.

## **1.2. Structure and Remainder of this Document**

The remainder of this document is structured as follows:

- Section 2 provides a summary of the general comments and specific responses to the Consultation Questions received from the Respondents, along with URCA's responses.
- Section 3 sets out URCA's Conclusion and Final Decision.

## **2. Responses to the Consultation**

In this section, URCA summarises and responds to the key comments received from the Respondents, including general comments, responses to the Consultation Questions, and any other relevant matters.

To ensure that this document provides a useful and succinct assessment of the Respondents' comments, URCA only addresses those responses which provide further material for discussion and/or clarification. Where Respondents have referred to matters that are outside of the scope of the Consultation Document, URCA, in those instances only provides a brief summary of those comments along with reasons supporting such positions.

### **2.1 General Comments**

#### Kuiper's General Comments

URCA notes Kuiper's endorsement of the proposed alignment of The Bahamas' spectrum allocations with international and regional standards. Kuiper specifically welcomed the proposal to allocate additional Ka-band frequencies (17.7-18.6 GHz, 18.8-19.3 GHz, 19.7-20.2 GHz, 27.5-29.1 GHz, and 29.5-30 GHz) to support Earth Stations in Motion (ESIM) activities by non-geostationary satellite orbit (NGSO) operators. Kuiper also supported URCA's proposal to allocate the 17.3-17.7 GHz (space-to-Earth) band for fixed-satellite service (FSS) use in The Bahamas on a co-primary basis.

Kuiper stated that its 'Project Kuiper' is designed to provide high-speed, affordable broadband to unserved and underserved communities globally, including in The Bahamas, and that it began launching its NGSO

satellite constellation in April 2025. Kuiper indicated that it has made significant strides in deployment since committing to invest over \$10 billion in the system, including expanding its terrestrial infrastructure and developing customer terminals intended to offer high performance in small form factors at affordable price points. Kuiper's stated goal is to ultimately provide high-speed, low-latency broadband services to residential, governmental, and enterprise customers in The Bahamas and worldwide, with commercial service beginning in certain parts of the world as deployment continues.

### Anonymous Respondent General Comments

Anonymous Respondent expressed its appreciation for the opportunity to contribute to the NSP consultation.

Anonymous Respondent articulated its strategic vision to deploy a Standalone Non-Public Network ("S-NPN") to address operational challenges and advance its digital transformation. Anonymous Respondent indicated that a S-NPN deployment is expected to provide the following benefits for Anonymous Respondent:

- Deterministic, low-latency wireless coverage tailored to operational zones.
- Secure network segmentation for applications such as IoT telemetry and surveillance.
- Operational autonomy from mobile network operators to ensure availability and control.

Anonymous Respondent communicated that its strategic vision is aligned with broader national goals for sustainability, innovation, and infrastructure modernisation.

Anonymous Respondent seeks to position itself as a large-scale, self-contained digital enterprise with complex operational requirements across customer, retail, utilities, and safety systems.

Anonymous Respondent expressed challenges with existing wireless infrastructure, including inconsistent coverage, manual processes, limited mobility for staff, and an inability to support real-time, mobile-first operational demands.

In principle, Anonymous Respondent supports URCA's objectives for the NSP. A central theme of Anonymous Respondent's submission is strong advocacy for a spectrum policy that facilitates localised, enterprise-grade connectivity. Emphasis was placed on the need for a licensing framework that moves beyond traditional models to include geographically bounded access, shared-use models, and tiered obligations that are proportionate to the scale of deployment.

The key policy recommendations put forward by Anonymous Respondent are as follows:

- The establishment of localised licensing opportunities within the IMT mid-band spectrum (3.3–3.8 GHz).
- The formal recognition of Standalone Non-Public Networks ("S-NPNs") as a legitimate and beneficial network model within the national framework.

- The introduction of flexible licensing formats, such as pilot programs and regulatory sandboxes, to foster innovation.
- The adoption of a tiered spectrum rights model to ensure equitable and responsible access.

Finally, Anonymous Respondent indicated a willingness to serve as a collaborative partner and a testbed for deployment to demonstrate the practical application and benefits of private 5G networks in strengthening national capabilities.

#### The CBL Group's General Comments

The CBL Group welcomed the opportunity to provide input on the NSP 2026-2029, acknowledged spectrum as a critical and scarce national resource and affirmed the value of a medium-term plan to ensure its efficient use for the national interest and for wireless users.

URCA notes that the overarching concerns and recommendations expressed by the CBL Group are as follows:

- The CBL Group disagreed with the current approach to spectrum pricing, suggesting a fundamental review of its purpose and implementation. The Group indicated a preference for its withdrawal to enable more rapid and extensive investment in network infrastructure.
- Regarding the expansion of access to underserved areas, the respondent shared the goal but cautioned that such expansion is often uneconomic. They suggested that shared networks or similar approaches may be the most viable method for delivery.
- On the subject of 5G, the CBL Group viewed it as a valuable technology for delivering increased capacity but not necessarily a transformative one for the user experience. Consequently, they urged URCA to refrain from imposing any mandatory deployment obligations for 5G.
- The CBL Group recommended the introduction of spectrum trading for all commercial spectrum, or at a minimum, for spectrum allocated to mobile use.
- A significant operational concern raised was regarding radio frequency interference from cruise ships and private yachts. The CBL Group noted that such issues have not been adequately addressed historically and urged URCA to strengthen its capabilities in monitoring and compliance enforcement.
- The CBL Group also sought clarification on a mentioned potential change to the treatment of unlicensed spectrum, noting that the consultation document provided no background or details on what this change might entail.

Finally, the CBL Group highlighted a concern regarding the regulatory timeline, noting the two-year gap between the expiration of the last NSP in 2023 and this new plan. The Group emphasized the statutory requirement under the Comms Act for an NSP to be produced every three years and expressed hope that URCA would be able to adhere to this requirement in the future to ensure the plan remains responsive to technological and market developments.

Although beyond the direct scope of the NSP consultation, the CBL Group also took the opportunity to reference the concurrent consultation on satellite-based communications services. They reiterated a key concern that satellite operators must be subject to a fair regulatory environment that does not place them at a competitive advantage to licensed local fixed and mobile providers, a point the Group has publicly emphasized in relation to ensuring a balanced market.

#### BTC's General Comments

BTC acknowledged the release of the consultation for the NSP 2026–2029 but expressed concern regarding the significant delay in its publication. BTC noted that the previous NSP covered the period 2020–2023 and was published on 20 March 2020 and highlighted that Section 30(4) of the Comms Act requires URCA to formulate and submit a revised spectrum plan within three years of each publication.

BTC emphasized that the Electronic Communications Sector (ECS) is undergoing rapid transformation, with increasing demand for both additional and new spectrum resources driven by users and applications requiring greater bandwidth. BTC further pointed out that during the intervening period between NSPs, emerging and advanced wireless technologies have gained traction regionally and globally, offering innovative and efficient solutions, particularly relevant to Small Island Developing States (SIDS) such as The Bahamas. BTC stressed that it is imperative that policy development keeps pace with technological advancement to ensure the continued success of the ECS in The Bahamas and affirmed its commitment to collaborating with URCA in this regard.

Separately, BTC highlighted concerns regarding the current framework for managing premium spectrum, which remains under the authority of the Minister charged with responsibility for the ECS. BTC indicated that this model does not readily support the agile decision-making necessary in the fast-evolving landscape of wireless technology.

Finally, while acknowledging that the purpose of the NSP consultation is to solicit the views of stakeholders to inform policy development, BTC observed that in some instances, the questions posed lacked sufficient context to enable a fully considered response.

#### URCA's Response to Kuiper's General Comments

URCA notes Kuiper's support for URCA's efforts to align The Bahamas' spectrum allocations with international and regional standards, as established by the ITU. This harmonisation is a core objective of the NSP, designed to facilitate the introduction of advanced services, promote equipment interoperability, and prevent harmful interference.

URCA further notes Kuiper's specific endorsement of the proposed allocations in the Ka-band to support Earth Stations in Motion (ESIM) for non-geostationary satellite orbit (NGSO) systems, as well as the co-primary allocation for fixed-satellite service (FSS) in the 17.3-17.7 GHz band. These allocations have been included in the draft NSP following a technical assessment, which confirmed their compatibility with existing services and their alignment with international best practices, particularly the outcomes of the World Radiocommunication Conference 2023 (WRC-23).

Regarding Kuiper's overview of 'Project Kuiper', URCA notes the information provided on the system's design objectives and current deployment status. URCA acknowledges the potential for NGSO satellite systems to provide connectivity solutions, particularly in archipelagic nations like The Bahamas. URCA is presently consulting on the development of a Regulatory Framework for Satellite-based Electronic Communications Services, which is intended to be technology-neutral and structured to accommodate new and innovative satellite offerings capable of serving the Bahamian public.

URCA notes that the provision of satellite-based electronic communications services to customers in The Bahamas currently requires licensing under the existing licensing framework. The forthcoming regulatory framework is intended to ensure that all satellite-based operators providing electronic communications services to customers in The Bahamas are subject, where applicable, to appropriate regulatory obligations.

URCA will continue to monitor technological and market developments in the satellite-based services in the ECS to ensure that its regulatory framework remains fit for purpose and supports the broader policy objectives of the Comms Act and the Electronic Communications Sector Policy (ECSP).

#### URCA's Response to Anonymous Respondent General Comment

URCA acknowledges and thanks Anonymous Respondent for its response to the Consultation on the NSP 2026-2029. URCA notes Anonymous Respondent's expression of support for the NSP's overarching objectives.

URCA has taken note of Anonymous Respondent's strategic vision for deploying a Standalone Non-Public Network (S-NPN) utilising mid-band spectrum. URCA is cognizant of the potential for advanced private networks to contribute to operational efficiency, digital resilience, and innovation within key economic sectors.

Anonymous Respondent's recommendations concerning the development of a licensing framework for localised spectrum access have been duly noted. URCA is constantly monitoring various spectrum management models, including geographically bounded licenses and considering shared access frameworks, in alignment with international best practices and the specific geographical and economic context of The Bahamas. The Anonymous Respondent's proposal for a pilot program or regulatory sandbox is noted as a constructive suggestion for fostering innovation while managing potential interference risks.

URCA further notes Anonymous Respondent's offer to act as a testbed for deployment. URCA maintains an open dialogue with all industry stakeholders and may consider such opportunities contingent upon the development of an appropriate regulatory framework.

It is important to state that any allocation of spectrum for commercial use, including private networks, must be conducted in a manner that is transparent, non-discriminatory, and promotes efficient use of this national resource. The recommendations put forward by Anonymous Respondent, among others, will inform URCA's ongoing policy development process concerning enterprise access to spectrum.

URCA's future considerations on this matter will be guided by the need to balance innovation with the principles of fair competition and the objectives of radio spectrum management set out in section 32 of

the Comms Act, ensuring that either the applied existing framework or any new framework, serves the broader public interest and contributes to the nation’s digital transformation goals.

### URCA’s Responses to the CBL Group’s General Comments

URCA thanks the CBL Group for its response to the Public Consultation on the Draft NSP 2026-2029. URCA has given full consideration to all points raised in the CBL Group’s submission, which have been instrumental in informing the final decision. This section addresses the general comments presented.

**I. Spectrum Pricing and Investment:**

URCA notes the CBL Group’s disagreement with the current approach to spectrum pricing and the request for its modification in order to facilitate increased network investment. URCA reaffirms that spectrum fees are not a fiscal tool, but a regulatory mechanism designed to promote the optimal use of a scarce public resource, as mandated under section 93 of the Comms Act<sup>2</sup>. URCA’s uses a variety of spectrum pricing methodologies, which are aligned with international best practices and applied transparently. URCA remains open to ongoing dialogue with industry on this matter to ensure the framework continues to balance the dual objectives of efficiency and investment promotion.

**II. Expanding Access to Underserved Areas:**

URCA notes the CBL Group’s concern regarding the economic challenges of serving underserved areas. URCA further notes that the CBL Group considers national coverage goals to be difficult to achieve. Nevertheless, URCA’s mandate, as set out in section 4 of the Comms Act and as reinforced by the ECSP, requires URCA to promote the availability of high-quality electronic communications networks and services across all islands of The Bahamas. URCA recognises that innovative approaches, including network sharing and public–private partnerships, may offer viable solutions for advancing the national priorities of digital inclusion and resilience. URCA will therefore assess the suitability of such models within the Bahamian context, taking into account market conditions, consumer interests, the ECS Policy 2024 – 2027 and its statutory mandate.

**III. 5G Deployment and Obligations:**

URCA notes the CBL Group’s view that, while 5G technology offers valuable additional capacity, it does not fundamentally transform the end-user experience, and its request that no mandatory obligations be imposed on its deployment. URCA will address all matters related to the deployment of 5G, including obligations, in its forthcoming Public Consultation on the Implementation of a 5G Regulatory Framework in The Bahamas.

**IV. Introduction of Spectrum Trading:**

---

<sup>2</sup> <https://www.urcabahamas.bs/wp-content/uploads/2016/08/The-Communications-Act-2009-.pdf>

URCA notes the CBL Group's recommendation on spectrum trading as a means to increase flexibility and efficiency in the market and establish the true value of the spectrum. In this regard, URCA advises CBL that pursuant to section 38(1) of the Comms Act, licensees are not permitted to assign the use of radio spectrum to third parties except as provided under subsection (2). Section 38(2) empowers URCA to publish rules and regulations governing the transfer of spectrum rights on a permanent or temporary basis. Accordingly, the establishment of any spectrum trading framework would therefore require a formal public consultation to assess stakeholder views and policy implications.

**V. Addressing Radio Frequency Interference:**

URCA has taken note of the CBL Group's claims relating to spectrum interference from maritime sources, such as cruise ships and private yachts. URCA recognises the critical importance of effective monitoring and compliance to safeguard service quality for consumers and operators. URCA confirms that it has engaged directly with the CBL Group regarding this complaint and that the matter is currently the subject of an ongoing investigation. As CBL is aware, the geographically dispersed and maritime nature of the complaint necessitates a careful and thorough investigative process. URCA has technical capabilities to address harmful radio frequency interference and will maintain its engagement with the CBL Group and other relevant stakeholders during its investigation.

**VI. Unlicensed Spectrum Provisions:**

The CBL Group sought clarity on potential changes to unlicensed spectrum. URCA confirms that any future changes to the framework for license-exempt spectrum will be subject to a separate, dedicated public consultation. This will provide all stakeholders with the necessary background, technical details, and opportunity to comment on any proposed modifications, ensuring full transparency throughout the process.

**VII. Timeliness of the NSP and Statutory Duty:**

URCA acknowledges the gap between the expiration of the previous NSP and this current plan. URCA is fully aware of its statutory duty under section 31(4) of the Comms Act to publish an NSP every three years and takes this obligation seriously. The development of the draft NSP 2026–2029 took additional time to ensure it reflects significant technological and regulatory developments, including outcomes from the World Radiocommunication Conference 2023 (WRC-23). URCA reaffirms its commitment to adhering to the statutory timeline, save and except for delays which may arise due to factors beyond URCA's control.

**VIII. Regulatory Environment for Satellite Operators:**

URCA considers that the CBL Group's comments on satellite-based services are beyond the immediate scope of this consultation on the draft NSP 2026 – 2029. URCA notes that it will

consider all matters related to satellite based electronic communications services in The Bahamas in the context of its ongoing public consultation<sup>3</sup>. [OBJ]

### URCA's Responses to BTC's General Comments

URCA thanks BTC for its engagement in the consultation process for the draft NSP 2026-2029. URCA has taken note of BTC's concern regarding the timeline for the publication of the draft NSP 2026 – 2029. URCA is fully cognisant of its statutory duty under section 31(4) of the Comms Act to publish an NSP every three years and takes this obligation seriously. The development of the draft NSP 2026–2029 took additional time to ensure it reflects significant technological and regulatory developments, including outcomes from the World Radiocommunication Conference 2023 (WRC-23). URCA reaffirms its commitment to adhering to the statutory timeline, save and except for delays which may arise due to factors beyond URCA's control.

URCA notes BTC's observation regarding the rapid transformation of the Electronic Communications Sector (ECS) and the critical importance of spectrum policy that keeps pace with technological advancement. The primary purpose of the NSP is to provide a framework that fosters innovation, meets growing bandwidth demands, and ensures the efficient use of spectrum, a valuable national resource. URCA welcomes BTC's stated commitment to collaboration in this endeavour.

Regarding the management of premium spectrum, URCA notes BTC's comments on the current framework and its concerns about agility in the face of rapidly evolving wireless technologies. The allocation of spectrum is conducted by URCA in accordance with the ECS regulatory framework, including the objectives of radio spectrum management set out in section 32 of the Comms Act. URCA's role in this process is clearly defined in the Comms Act, particularly section 29 of the Comms Act, and URCA executes its mandate accordingly.

Further, URCA notes that pursuant to section 30 of the Act, the Minister with responsibility for the ECS is responsible for determining the method of allocation of frequencies in the premium spectrum bands. Any change to this model would require legislative amendment, which falls outside of URCA's regulatory remit. Nevertheless, URCA will continue to ensure that spectrum is managed and used in a manner consistent with the objectives of section 32 of the Comms Act. In particular, URCA will ensure that spectrum is managed in an economically efficient manner and in a way that facilitates the evolution of new technologies and the provision of innovative electronic communications services.

Finally, URCA acknowledges BTC's feedback on the structure of the consultation document. Stakeholder input is vital to the consultation process, and this feedback will be considered to enhance the clarity and context provided in future consultations.

URCA remains focused on finalising a NSP that promotes investment, competition, and innovation in the Bahamian electronic communications sector for the benefit of all consumers.

---

<sup>3</sup> <https://urcabahamas.bs/wp-content/uploads/2024/12/Consultation-Document-URCA-satellite-regulatory-framework-06Dec2024.pdf>

## 2.2 Consultation Questions and Responses

### Consultation Question 1: Objectives of the revised National Spectrum Plan:

*Do you agree/disagree with the overarching objectives of the NSP 2026-2029? Please give reasons why you disagree.*

### Summary of Comments for Question 1:

- **Anonymous Respondent:** Anonymous Respondent expressed its support for URCA's strategic objectives as outlined in the draft NSP 2026 - 2029, further stating that its Private 5G network deployment plans align with the national goals of Equitable Access, Support for Innovation, and National Development. Anonymous Respondent indicated that such a network would extend high-performance connectivity into specialised enterprise environments, facilitate advanced technologies like IoT and AI-driven analytics, and support the nation's wider transformation agenda by promoting infrastructure modernisation. To fully support these objectives, Anonymous Respondent recommended that URCA explicitly recognise enterprise-led spectrum use (S-NPNs) as a national innovation driver. The licensee further suggested that embedding localised licensing models into the execution framework would broaden participation in the digital economy and ensure spectrum utilisation remains efficient, inclusive, and demand driven.
- **BTC:** BTC agrees that periodic reviews of spectrum assignments are critical for the efficient and effective use of a limited resource, as technology and user needs evolve.
- **The CBL Group:** The CBL Group provided no comment on this question.
- **Kuiper:** No specific response to this question.

### URCA's Response and Final Position on Consultation Question 1:

- **URCA's Response to Anonymous Respondent:** URCA notes Anonymous Respondent's support for URCA's proposed strategic objectives, and Anonymous Respondent's private 5G goals alignment with the NSP's objectives of equitable access, innovation, and national development. As indicated in the draft NSP, the objectives are designed to foster a forward-looking spectrum management framework in The Bahamas.

**URCA's Response to BTC:** URCA agrees with BTC's assessment that periodic reviews of spectrum assignments are critical to the efficient and effective use of this limited national resource. The regular

review and revision of the NSP, as mandated by the Comms Act, is a central tenet of URCA's regulatory approach.

#### Consultation Question 2: Guiding principles for spectrum management

*Do you agree/disagree with URCA's guiding principles for spectrum management? Please give reasons why you disagree.*

#### Summary of Comments for Question 2:

- **Anonymous Respondent:** Anonymous Respondent expressed support for the strategic objectives outlined in the NSP. Anonymous Respondent stated that its Private 5G network deployment aligns with the national goals of Equitable Access, Support for Innovation, and National Development. Anonymous Respondent indicated that such a network would extend high-performance connectivity into specialised enterprise environments, facilitate advanced technologies like IoT and AI-driven analytics, and support the nation's broader transformation agenda by promoting infrastructure modernisation. To fully support these objectives, Anonymous Respondent recommended that URCA explicitly recognise enterprise-led spectrum use (S-NPNs) as a national innovation driver. Anonymous Respondent further suggested that embedding localised licensing models into the execution framework would broaden participation in the digital economy and ensure spectrum utilisation remains efficient, inclusive, and demand driven.
- **BTC:** BTC finds the guiding principles to be a "strong foundation" for effective spectrum management, placing their emphasis on efficiency, transparency, non-discrimination, technological neutrality, and international harmonisation.
- **The CBL Group:** No direct response to Question 2.
- **Kuiper:** No direct response to Question 2.

#### URCA's Response and Final Position on Consultation Question 2:

- **URCA's Response to Anonymous Respondent:** URCA notes Anonymous Respondent's view that the guiding principles should move beyond theory to support practical frameworks that enable localised access and enterprise-led innovation, including potential initiatives such as Standalone Non-Public Networks (S-NPN). URCA will take these perspectives into account as it considers how the final NSP will inform its future regulatory projects and other workstreams.
- **URCA's Response to BTC:** URCA appreciates BTC's acknowledgement of the guiding principles as a "strong foundation" for effective spectrum management and its anticipation for their implementation. URCA confirms that it is committed to ensuring these principles translate into actionable and well-executed policies that benefit the electronic communications sector and The Bahamas.

#### Consultation Question 3: Strategic objectives for spectrum Management

*Do you agree/disagree with URCA's strategic objectives for spectrum management? Please give reasons why you disagree.*

Summary of Comments for Question 3:

- **Anonymous Respondent:** No direct responses to Question 3.
- **BTC:** BTC agreed with the objective of expanding access to underserved and remote communities but highlighted a significant challenge: it is "uneconomic" for mobile operators to do so by building dedicated terrestrial networks under the current model. BTC stresses the need for a "long-term, sustainable plan" that accounts for the practical implementation challenges posed by the Bahamian geography.
- **The CBL Group:** The CBL Group agreed with the importance of expanding access to underserved and remote communities. The Group further stated that it is uneconomic for mobile operators to expand coverage using the current approach of building dedicated terrestrial networks. The CBL Group expressed a keenness to explore alternative approaches. It cited the UK's Shared Rural Network (SRN) as an example where mobile network operators share a single network with partial government funding. The Group suggested that a similar model, involving a subsidy covering both capital and operational expenditures, be explored for The Bahamas. The response noted that any such arrangement would require careful design to ensure productive and fair collaboration between competing operators. The CBL Group also noted the emerging role of satellite connectivity in delivering services to uncovered areas and stated that further regulatory change would be required for its implementation. The CBL Group recommended that URCA convene discussions among mobile network operators, government, and other stakeholders to explore practical ways to enhance coverage. The CBL Group also indicated it looks forward to URCA's forthcoming consultation on Universal Service, where it believes this matter should be given detailed consideration.
- **Kuiper:** No direct responses to Question 3.

URCA's Commentary and Final Position on Consultation Question 3:

- **URCA's Response to BTC:** URCA notes BTC's concern about the significant deployment costs in underserved and remote communities and agrees with the need for a "long-term, sustainable plan" that accounts for the practical implementation challenges of the Bahamian geography. URCA notes that there is a pending USF public consultation where BTC can expand on what is envisaged in long-term and sustainable planning.
- **URCA's Response to The CBL Group:** URCA notes the CBL Group's proposal to explore alternative models like a "Shared Rural Network" with government subsidies to make rural expansion economically viable. URCA notes that there is currently the Communications License Fee Reduction Program that allows for investment recovery in unserved and underserved markets, and further, a pending USF public consultation where the CBL Group will have the opportunity to present a more comprehensive view of the subsidy model.

Additionally, URCA maintains ongoing dialogue with all stakeholders, including licensed operators, the Government, and other relevant entities, to advance the shared objective of ensuring that high-quality, resilient, and affordable electronic communications services are available throughout The Bahamas in support of national connectivity and digital inclusion goals.

#### Consultation Question 4:

*Do you agree/disagree with URCA's guiding principles and strategic objectives for spectrum management? Please give reasons why you disagree.*

#### Summary of Comments for Question 4:

- **Anonymous Respondent:** Anonymous Respondent expressed support for URCA's continued alignment with international recommendations and global frequency allocations, noting that such designations help harmonise national spectrum use and reduce deployment costs. Anonymous Respondent stated, however, that designation alone does not ensure enterprise access to spectrum. Anonymous Respondent indicated that its Private 5G deployment is dependent on access to a contiguous 100 MHz channel within the IMT mid-band range, which it described as critical for achieving the performance standards defined for 5G. Anonymous Respondent recommended that URCA reserve enterprise-accessible sub-bands within the national IMT allocation and establish a regulatory pathway for their use in Standalone Non-Public Networks (S-NPNs).
- **BTC:** BTC views URCA's principles and objectives as "reasonable" and commends URCA's alignment with WRC-23 outcomes.
- **The CBL Group:** the CBL Group, however, adds a critical caveat, arguing against mandated 5G deployment without a detailed business case or government subsidies due to the high capital intensity of the infrastructure. The CBL Group also raises a separate concern regarding Direct-to-Device (D2D) satellite services, advocating for a policy that requires satellite operators to partner with national MNOs to ensure local control of networks, citing the FCC's Supplementary Coverage from Space (SCS) regulation as a model.
- **Kuiper:** No direct responses to Question 4.

#### URCA's Commentary and Final Position on Consultation Question 4:

- **URCA's Response to Anonymous Respondent:** URCA notes Anonymous Respondent's support for URCA's continued alignment with International Telecommunication Union Radiocommunication Sector (ITU-R) recommendations and IMT-2020 global frequency allocations. URCA agrees that

such alignment is critical for harmonising national spectrum use, ensuring equipment interoperability, and reducing deployment costs, which are core objectives of the National Spectrum Plan (NSP) 2026-2029

- **URCA's Response to BTC:** URCA notes BTC's view that its principles and objectives are "reasonable" and appreciates its commendation for the Authority's alignment with WRC-23 outcomes. URCA will continue to ensure its policies are grounded in international best practices and support a modern and efficient spectrum governance framework.
- **URCA's Response to The CBL Group:** URCA notes the CBL Group's feedback that the promotion of technologies such as 5G must be market-driven and economically sound. The NSP does not seek to mandate 5G deployment but to create an enabling policy environment to do so efficiently and practically. URCA therefore invites the CBL Group to provide any specific comments on 5G during the upcoming consultation process on the Implementation of the 5G Regulatory Framework. With respect to Direct-to-Device (D2D) services, URCA advises that the CBL Group will have the opportunity to provide comments in the second round of its ongoing public consultation on the Regulatory Framework for Satellite-based Electronic Communications Services

#### Consultation Question 5: Amendments to National Frequency Allocation Table

*Do you agree/disagree with URCA's proposed amendments to the NFAT? Please give reasons why you disagree.*

#### Summary of Comments for Question 5:

- **Anonymous Respondent:** No direct response
- **BTC:** BTC expressed general support for URCA's proposed amendments to the National Frequency Allocation Table (NFAT), noting that they reflect alignment with international outcomes and promote innovation.

However, BTC expressed concern regarding the proposed designation of the 1885–1980 MHz and 2500–2690 MHz bands for HAPS/HIBS operations. BTC noted that these bands overlap with the spectrum currently deployed in its own network under existing spectrum licenses, specifically identifying Band 2 and Band 41.

Given this overlap, BTC requested further clarification from URCA on how coexistence or a potential transition within these bands would be managed. BTC believes any discussion on the distribution of this spectrum should be conducted in a manner that is equitable, collaborative, and transparent. BTC emphasised the critical importance of ensuring that any reallocation or shared use does not disrupt existing services and that operators are actively involved in the planning process to maintain service continuity and protect existing infrastructure investments. BTC concluded by stating it looks forward to clear guidelines and a robust dialogue with URCA on this matter.

- **The CBL Group:** No direct response to Question 5.

- **Kuiper:** Kuiper welcomed URCA's proposed amendments to the National Frequency Allocation Table (NFAT) to promote harmonisation with international decisions from WRC-23 and CITELE PCC.II.

Kuiper expressed particular support for the proposal to enable Non-Geostationary Orbit Earth Stations In Motion (NGSO ESIM) within specific Ka-band frequencies. Kuiper stated that enabling these bands, consistent with international standards, would facilitate the broader deployment of innovative maritime and aeronautical connectivity technology, bringing considerable benefits to The Bahamas. Kuiper encouraged URCA to license NGSO ESIM activities in these frequencies consistent with the operational restrictions outlined in Resolution 123 (WRC-23).

Further, Kuiper welcomed the allocation of the 17.3-17.7 GHz band to Fixed-Satellite Service (FSS) on a co-primary basis. Kuiper stated that this update, aligned with WRC-23 outcomes, would facilitate the ability of FSS operators to provide high-quality broadband connectivity. Kuiper commended URCA for ensuring these Ka-band frequencies are made available and for aligning the NFAT with internationally harmonised spectrum allocations.

#### URCA's Commentary and Final Position on Consultation Question 5:

- **URCA's Response to Kuiper:** URCA welcomes Kuiper's support for the Ka-band allocations for Earth Stations in Motion (ESIMs) and appreciates its commendation for URCA's efforts to align the NFAT with WRC-23 and CITELE standards, noting that this will facilitate the deployment of innovative services. URCA has amended the NFAT which aligns The Bahamas with international standards and harmonization.
- **URCA's Response to BTC:** While generally supportive, BTC raised a specific and legitimate concern regarding the proposed designation of the 1885-1980 MHz and 2500-2690 MHz bands for HAPS/HIBS, which it noted overlaps with its existing license concessions. BTC specifically requested a collaborative and transparent process to manage coexistence or a potential transition protecting its investments and ensuring service continuity. URCA notes these concerns and would like to advise BTC that studies were completed leading up to WRC-23, resulting in Resolution 221, which confirms that through a combination of technical protocols and regulatory process, harmful interference can be avoided. This sets parameters such as maximum power flux density and direction limitation, for the protection of fixed services, mobile services, aeronautical mobile service, aeronautical radionavigation service and will be allowed only on the condition that it causes no harmful interference to incumbents. This is determined by technical analysis during the application stage. Administrations outside the Bahamas planning to utilise such spectrum will be required to undergo coordination with the Bahamas to ensure that no harmful cross-border interference is experienced.<sup>4</sup>

#### Consultation Question 6:

---

<sup>4</sup> Radio Regulations No. 5.388A, No. 5.409, No. 9.21

*Do you agree/disagree with URCA's proposal to formulate spectrum band plans? Do you agree with URCA's proposed use of the above standardised technical parameters for development of spectrum band plans? Please suggest any additional technical or policy elements that should inform band planning.*

Summary of Comments for Question 6:

- **Anonymous Respondent:** Anonymous Respondent expressed support for URCA's alignment with ITU-R and IMT-2020 standards, emphasising the importance of global harmonisation for equipment interoperability and cost efficiency. Anonymous Respondent noted, however, that international designation alone does not guarantee enterprise access to spectrum. Anonymous Respondent stressed the need for URCA to implement specific licensing mechanisms, such as localised or shared licensing to enable private network deployment. The submission highlighted a technical requirement for a contiguous 100 MHz channel within the 3.3–3.8 GHz band to meet 3GPP 5G NR standards for low-latency, high-throughput performance, which is essential for operational use cases. Anonymous Respondent recommended that URCA reserve dedicated enterprise-accessible sub-bands and establish a clear regulatory pathway for Standalone Non-Public Networks (S-NPNs) to facilitate private 5G deployment.
- **BTC:** BTC expressed the view that URCA's proposal to formulate spectrum band plans is aligned with best practices and is a necessary step to ensure efficient and interference-free use of spectrum resources.

BTC stated that the use of standardised technical parameters is consistent with international best practices and will help ensure alignment with ITU-R recommendations and regional harmonisation.

BTC recommended the inclusion of several additional elements in the band planning process. These suggestions included the definition of clear coexistence guidelines for sharing bands with existing services, the consideration of different deployment scenarios for urban and rural needs, the establishment of migration frameworks with timelines for reallocating existing licenses, the involvement of operator stakeholder input in technical planning to ensure feasibility, and the allowance for technology neutrality where interference is managed.

- **The CBL Group:** the CBL Group cautioned that the band plans should not "restrict current usage" or increase interference. The CBL Group further recommended that the development of band plans be done through consultation.
- **Kuiper:** No direct response to question 6.

URCA's Commentary and Final Position on Consultation Question 6:

- **URCA's Response to Anonymous Respondent:** URCA affirms that its spectrum management framework is guided by the core objectives of the Electronic Communications Sector Policy ("ECSP") and the Communications Act ("CA"), which prioritize efficient spectrum use, promotion of competition, and facilitation of new technologies for the benefit of consumers and the national economy. URCA is presently engaged in a comprehensive consultative process to develop a

roadmap for 5G deployment in The Bahamas and is actively evaluating the spectrum requirements and regulatory models necessary to enable a successful rollout of next-generation services. This includes those pertinent to enterprise and industry applications. URCA notes the licensee's support for alignment with international standards and reiterates that its framework for the National Frequency Allocation Table ("NFAT") is designed to harmonize with international allocations, which aids in ensuring equipment interoperability and reducing deployment costs. URCA acknowledges the technical requirement for a contiguous spectrum block to support advanced 5G use cases and will be able to continue discussions with Anonymous Respondent. URCA's conclusion of the "Roadmap to enable 5G deployment in The Bahamas" (ECS73/2024) consultation, will yield the clarity and structure to allow the access Anonymous Respondent is seeking.

- **URCA's Response to BTC:** URCA appreciates BTC's detailed suggestions for including coexistence guidelines, deployment scenarios, and stakeholder input in the band planning process. The proposed band plans will incorporate these elements as outlined in the proposed NSP 2026-2029 in order to ensure real-world feasibility and to prevent harmful interference, thereby maximising spectrum utilisation for all users. For the avoidance of doubt, URCA notes that band plans will be developed in accordance with the ECSP and international standards, and through a transparent consultative process that allows all stakeholders the opportunity to provide input before finalisation.
- **URCA's Response to The CBL Group:** URCA notes the CBL Group's caution that band plans "should not restrict current usage or increase interference". URCA confirms that the prevention of harmful interference is a primary goal of spectrum management and that it will not develop band plans that compromise existing services. For the avoidance of doubt, URCA notes that band plans will be developed in accordance with the ECSP and international standards, and through a transparent consultative process that allows all stakeholders the opportunity to provide input before finalisation.

#### Consultation Question 7:

*Do you support URCA's proposal to open previously closed spectrum bands to increase market access? What considerations should guide the selection and provisioning of new spectrum bands?*

#### Summary of Comments for Question 7:

- **Anonymous Respondent:** Anonymous Respondent reiterated its requirement for access to a contiguous 80–100 MHz channel within the 3.3–3.8 GHz band to support its proposed Private 5G deployment conforming with 3GPP NR specifications. An emphasis was put on channelisation, synchronisation, and coexistence parameters, all being critical for effective enterprise implementation. Anonymous Respondent's submission expressed support for URCA's alignment with internationally harmonised band plans for IMT services, noting that such frameworks promote global equipment availability and efficient spectrum use. Anonymous Respondent

emphasised that channelisation structures must also accommodate real-world deployment needs, particularly for private enterprise networks.

Anonymous Respondent indicated the following as being critical to their business case:

- Autonomous energy management that uses AI to dynamically adjust power distribution.
- Real-time video surveillance analytics that depend on ultra-reliable low-latency communication (URLLC).
- Predictive maintenance telemetry for facilities and critical equipment, requiring consistent uplink throughput. To support coexistence with public mobile networks, we recommend that URCA adopt band planning policies that include:
  - Non-fragmented channel options suitable for enterprise-grade deployments.
  - Time Division Duplex (TDD) synchronisation guidance to reduce cross-boundary interference.
  - Guard band or geographic separation rules that protect both MNO and enterprise use cases.
- **BTC:** BTC supports the initiative to open bands to foster innovation, emphasizing the need for a transparent process, flexibility and "clean spectrum" that is free from harmful interference.
- **The CBL Group:** The CBL Group notes that it is not clear from the list of bands to be opened which were designated for 5G, but specifically asks for clarification on what spectrum will be made available for 5G, stating its preference for bands N71 (600 MHz) and N77 (3500 MHz).
- **Kuiper:** No direct response to Question 7.

#### URCA's Commentary and Final Position on Consultation Question 7:

- **URCA's Response to Anonymous Respondent:** URCA thanks Anonymous Respondent for its detailed technical recommendations, such as Time Division Duplex (TDD) synchronization and guard bands, to ensure its private network can coexist with public networks. URCA notes Anonymous Respondent's comments and supports the development of band plans for localized networks which ensure real-world feasibility and the co-existence of the network of all licensees.
- **URCA's Response to BTC:** URCA affirms its commitment to opening new spectrum bands to facilitate market entry and innovation, a position supported by BTC. URCA confirms that it will prioritise ensuring all newly opened bands are "clean" and free from harmful interference before they are assigned. The assignment process will be conducted in a fair and transparent manner.
- **URCA's Response to The CBL Group:** URCA notes the CBL Group's request for clarification on what spectrum will be made available for 5G and its preference for bands N71 (600 MHz) and N77 (3500 MHz). URCA confirms that, as stated in its Statement of Results and Next Steps on the 2024 5G Public Consultation, and further reinforced through URCA's pre-consultation engagement with CBL

and other stakeholders earlier this year, the specific bands for initial 5G deployment will be addressed in the upcoming public consultation on the Implementation of the 5G Regulatory Framework Project. URCA's proposals on spectrum and other technical matters will be identified and presented as part of that process.

#### Consultation Question 8:

*Do you agree/disagree with URCA's updated framework for spectrum pricing? Please give reasons why you disagree. Are there additional considerations or methodologies URCA should explore to enhance fairness, innovation, and efficiency?*

#### Summary of Comments for Question 8:

- **Anonymous Respondent:** No direct response to Question 8.
- **BTC:** URCA notes BTC's general support for the development of an updated framework for spectrum pricing that is aligned with international best practices and reflects a balanced approach to promoting efficient spectrum use.

BTC expressed in its opinion that the current proposal is not a substantive framework but a suggestion of ideas, and it looks forward to assessing a comprehensive framework in a future consultation. BTC appreciated the flexibility of multiple pricing models but stated that any incentive fee formula, including its constituent factors, should be fully explained with a transparent methodology.

BTC put forth a recommendation that URCA consider several additional elements to enhance the framework. These recommendations included implementing reduced or tiered pricing for spectrum used to expand coverage in underserved areas, establishing periodic reviews of pricing models to reflect market changes, ensuring pricing methodologies are stable and predictable to support long-term investment, conducting stakeholder impact assessments before applying new models or reclassifying bands, and advocating for transparent methodologies and stakeholder consultation in the Minister with responsibility for the ECS' process for setting Premium Spectrum fees.

- **The CBL Group:** the CBL Group expressed disagreement with the updated framework for spectrum pricing and instead suggested a fundamental review of its rationale and methodology.

The Group articulated that spectrum pricing is a tool intended to ensure efficient use of spectrum by reflecting its opportunity cost, or the value of its next best alternative use. Further, The CBL Group stated that calculating this cost is challenging and requires many assumptions, making it difficult to set a price that neither discourages use nor encourages hoarding. The response

referenced an independent study by Analysys Mason (2022), which concluded that such pricing was no longer needed for spectrum efficiency in mature markets, as trading provides sufficient incentives.

The CBL Group posited that spectrum pricing should have been a transitory tool and that its current application effectively raises costs for operators, which are then passed on to consumers. The Group also noted a conflict between the current pricing model, which incentivizes minimizing coverage due to fees based on the number of islands covered, and URCA's policy objective of extending coverage as widely as possible.

Additionally, the CBL Group strongly recommended that spectrum pricing is no longer appropriate and should be withdrawn. The CBL stated that If pricing is to be used it should be set consistently across all users and factor in the complexities of determining the correct level, with the ultimate goal of promoting investment and innovation.

- **Kuiper:** No direct response to Question 8.

#### URCA's Commentary and Final Position on Consultation Question 8:

- **URCA's Response to BTC:** URCA acknowledges BTC's support for the idea of an updated pricing framework and notes its demand for a substantive and fully explained model for consultation. URCA will take this into account in the context of future consultations, which will involve consideration of appropriate methodologies for spectrum pricing.
- URCA's objective in this regard is to outline spectrum pricing methodologies that may be applicable, with spectrum pricing to be assessed on a case-by-case basis. Stakeholders, including BTC, will have the opportunity to review and comment on the proposed methodologies during the consultation process
- **URCA's Response to The CBL Group:** URCA notes the CBL Group's fundamental disagreement with the concept of pricing for mobile spectrum, its view that it is an outdated "regressive tax" on operators, and its argument that the current model conflicts with the goal of broader coverage.

URCA notes that there are varying schools of academic and regulatory thought on the issue of spectrum pricing. While the CBL Group has highlighted one perspective, international regulatory guidance recognizes that spectrum pricing can serve as an important spectrum management tool.<sup>5</sup>

In particular, international practice recognizes that spectrum fees may be used to promote efficient spectrum occupancy and effective frequency utilization, taking into account the

---

<sup>5</sup> See International Telecommunication Union, ITU-R Report SM.2012-4 (para 2.2.2), Economic aspects of spectrum management, para. 2.2.2 (2014), which recognises that spectrum fees may serve multiple objectives, including acting as a tool for spectrum management and promoting efficient spectrum use. Available at [https://www.itu.int/dms\\_pub/itu-r/opb/rep/R-REP-SM.2012-4-2014-PDF-E.pdf](https://www.itu.int/dms_pub/itu-r/opb/rep/R-REP-SM.2012-4-2014-PDF-E.pdf)

economic value derived by spectrum users and the need to manage a limited and, in some cases, scarce public resource<sup>6</sup>.

URCA also reminds the CBL Group that, as it is aware, spectrum fees are mandated under Section 93 of the Comms Act. Accordingly, any proposal to eliminate spectrum fees would therefore require legislative amendment, which falls outside the scope of URCA's remit.

URCA reaffirms its earlier stated position that pricing is a legitimate tool for promoting efficiency and preventing hoarding. URCA notes that there are varying methodologies for spectrum pricing, as reflected in its Spectrum Pricing Framework, including approaches based on administrative cost recovery, as well as those designed to promote widescale deployment in underserved and unserved areas or to reflect opportunity cost. URCA will apply the appropriate methodology consistent with Government's policy direction, while ensuring that spectrum pricing continues to function as an efficiency tool and provide stability in projected costs for operators in the face of highly dynamic market forces.

URCA also considers that the absence of spectrum fees, in and of itself, does not guarantee that an operator will deploy in unserved and underserved markets. Coverage in such areas is often influenced more by commercial viability and infrastructure challenges than by the presence or absence of spectrum fees. Accordingly, URCA maintains that spectrum pricing should remain an efficiency tool, while targeted mechanisms such as shared networks, incentives such as the Government's Communications Licence Fee Reduction Scheme, and the Universal Service Fund are supplemental instruments for advancing remote and underserved area coverage.

#### Consultation Question 9:

*URCA is considering a new regulatory framework for commercial use of licence-exempt spectrum. Do you support this initiative? What safeguards or conditions should be considered?*

#### Summary of Comments for Question 9:

- **Anonymous Respondent:** No direct response to Question 9.
- **BTC:** BTC acknowledged URCA's concern regarding the commercial use of license-exempt spectrum and agreed that a reassessment of the regulatory framework may be warranted. BTC further stated that any new framework should be proportionate, flexible, and risk-based.

BTC suggested that registration requirements or additional regulatory obligations should only be applied under specific conditions. These conditions included exceeding defined power emission thresholds, using significant bandwidth or spectrum capacity, operating in congested environments with a demonstrable interference risk, or deploying infrastructure intended for commercial service delivery. Further, BTC expressed the view that this approach would preserve

---

<sup>6</sup> <https://www.ofcom.org.uk/siteassets/resources/documents/consultations/uncategorised/8288-srsp/associated-documents/srsp-statement.pdf?v=322048>

the innovative nature of license-exempt spectrum while ensuring harmonious operation between commercial and non-commercial users.

BTC referenced its ongoing discussions with URCA regarding its next-generation fixed wireless access solution, which utilises unlicensed spectrum in the 5GHz and 6GHz bands, and stated that this spectrum can enable efficient service delivery on sparsely populated islands where other technologies may not be economically viable.

BTC recommended that the Unlicensed National Information Infrastructure (UNII) model implemented by the U.S. Federal Communications Commission (FCC) could be used to inform local policies, noting that most electronic communication platforms are sourced from U.S. entities. BTC concluded by expressing anticipation of participating in the development of a framework for the use of unlicensed spectrum networks in The Bahamas.

**The CBL Group:** the CBL Group indicated that it is difficult to comment substantively on a proposed new framework for licence-exempt spectrum without further details. The CBL Group cautioned that any framework should not deviate significantly from approaches adopted in the United States, noting that much of the relevant equipment originates from the U.S. and that enforcing a policy materially different from U.S. or global norms may not be feasible.

The CBL Group emphasised that any policy must be enforceable, suggesting that type approval regulations and regimes would be necessary to prevent the sale and use of unapproved equipment in The Bahamas.

**Kuiper:** No direct response to Question 9.

#### URCA's Commentary and Final Position on Consultation Question 9:

- **URCA's Response to BTC:** URCA notes BTC's position that a new framework for commercial use of license-exempt spectrum should be proportionate, flexible, and risk-based. URCA has also taken note of BTC's specific recommendations that regulatory obligations should only apply under certain conditions, such as exceeding power thresholds or operating in congested environments. URCA advises that all relevant matters and approaches taken in other jurisdictions will be considered any public consultation URCA conducts on the commercial use of licence-exempt spectrum.
- **URCA's Response to The CBL Group:** URCA notes the CBL Group's caution that a framework that deviates from U.S. norms would be difficult to enforce and acknowledges its concern about commenting without more details. For the avoidance of doubt, URCA confirms that a framework for the commercial use of licence-exempt spectrum will be developed through a consultation process and will take into account international best practices, including those in the United States. URCA's preliminary view The Bahamas has a unique geography and population density distribution profile that lends itself to advantageously utilising license exempt spectrum in this way.

#### Consultation Question 10:

*Do you agree with URCA's proposed licensing and authorisation framework? Are there additional authorisation mechanisms or licence conditions that should be considered to meet national connectivity, innovation, or competition goals?*

Summary of Comments for Question 10:

- **Anonymous Respondent:** Anonymous Respondent advocated for the adoption of a localised or shared-access licensing model to enable enterprises to operate private 5G networks within clearly defined geographic boundaries.

Anonymous Respondent contended that this approach allows for secure and efficient spectrum use in high-value areas that may not be fully served by national mobile operators, while maintaining coexistence safeguards. Anonymous Respondent identified its resort campus as a self-contained and secure environment that is ideally suited for such a geographically bounded license, citing its concentrated and consistent operational needs.

Anonymous Respondent indicated that this model supports national goals by increasing total spectrum utilisation in underused locations, reducing the entry barrier for innovation among private enterprises, and enabling URCA to implement flexible, demand-driven spectrum management policies. The response referenced international precedents for this approach, including frameworks in the United States (CBRS), Germany (3.7–3.8 GHz band), and the United Kingdom (3.8–4.2 GHz range).

Anonymous Respondent encouraged URCA to adopt a similar localised or shared-access licensing model for the 3.3–3.8 GHz band to enable the deployment of Standalone Non-Public Networks (S-NPNs) and unlock spectrum-driven innovation at the local level.

- **BTC:** BTC indicated that while it generally supports URCA's proposed licensing and authorisation ideas, it is unable to fully agree or disagree in the absence of a substantive framework to review through a formal consultation process.

BTC expressed that the administration and assignment of premium spectrum bands have been a persistent concern. BTC reiterated a position from its previous consultation response, emphasising that a clear and transparent process for the acquisition of premium spectrum should be defined. BTC's view is that any new allocations should be conducted through a multi-step public consultation to ensure they are made in an open, objective, transparent, and non-discriminatory manner.

BTC recommended that any revision of the licensing and authorisation framework should focus on streamlining the acquisition of premium spectrum. BTC also proposed that the framework should incorporate several guiding principles to enhance its overall effectiveness. These included simplified processes for innovative or rural deployments, clear renewal criteria to support long-term planning, support for shared and dynamic access models, and ongoing stakeholder consultation for any new mechanisms. BTC expressed the view that the inclusion of these elements would help meet national goals for connectivity, innovation, and competition.

- **The CBL Group:** the CBL Group expressed a strong belief that URCA should introduce trading to mobile spectrum. The Group contended that trading should allow operators to sell, lease, and subdivide their spectrum allocations to enable market forces to ensure the most efficient use of this resource.

Further, the Group advocated that spectrum trading is widely implemented internationally, and that economic theory suggests markets have better insight into costs and possibilities for its use. The response cited the United States as an example where trading has allowed operators to balance spectrum holdings and facilitate innovative uses.

The Group also indicated that trading functions more effectively where licence durations are extended, providing greater certainty for transactions. The CBL Group encouraged URCA to consider extended duration licences or a move towards automatic renewal in the absence of significant sector changes to encourage investment and reduce the administrative burden associated with frequent award processes.

- **Kuiper:** No direct responses to Question.

#### URCA's Commentary and Final Position on Consultation Question 10:

- **URCA's Response to The CBL Group:** URCA has taken note of the CBL Group's strong advocacy for the introduction of "spectrum trading" to allow market forces to ensure the most efficient use of spectrum. As stated earlier in this document, URCA advises CBL that pursuant to section 38(1) of the Comms Act, licensees are not permitted to assign the use of radio spectrum to third parties except as provided under subsection (2). Section 38(2) empowers URCA to publish rules and regulations governing the transfer of spectrum rights on a permanent or temporary basis. Accordingly, the establishment of any spectrum trading framework would therefore require a formal public consultation to assess stakeholder views and policy implications. URCA will consider whether the development of such a framework should form part of its future regulatory projects.
- **URCA's Response to BTC:** URCA notes BTC's repeated concern about the lack of a clear, transparent process for the acquisition of premium spectrum. URCA reaffirms its commitment to a transparent and non-discriminatory process as demonstrated in this consultation and its findings. URCA reiterates that section 93 of the Comms Act prescribes the method by which premium spectrum is to be assigned. Any change to this statutorily prescribed method would require legislative amendment, which falls outside the scope of URCA's regulatory remit.
- **URCA's Response to Anonymous Respondent:** Regarding Anonymous Respondent's advocacy for flexible, localised, and tiered licensing models that would empower enterprises to deploy their own networks, URCA notes that the existing spectrum management framework allows for such licensing.

#### Consultation Question 11: Spectrum Monitoring and Compliance

*Do you support URCA's approach to monitoring and compliance? Are there specific technologies, procedures, or engagement strategies you believe URCA should adopt to strengthen enforcement and stakeholder cooperation?*

Summary of Comments for Question 11:

- **Anonymous Respondent:** Anonymous Respondent expressed support for URCA's consideration of a flexible licensing framework that includes a tiered rights structure.

Anonymous Respondent stated that this approach would allow URCA to match spectrum authorisation terms to the scale, location, and impact of different deployments, rather than applying a uniform national license model. Anonymous Respondent outlined that a tiered framework would enable national mobile network operators to retain broad rights for country-wide service, allow medium-scale operators to access regional licenses with proportionate obligations, and permit enterprises to obtain localised licenses for campus-based deployments with minimal regulatory complexity.

Anonymous Respondent indicated that this model would improve administrative efficiency and promote equitable access by enabling non-traditional stakeholders in sectors such as hospitality, education, and utilities to invest in high-performance networks. The response concluded that without such flexibility, private network deployment would be limited to unlicensed bands or dependent on coordination with mobile network operators, thereby restricting innovation, privacy, and service assurance.

- **BTC:** BTC expressed support for URCA's approach to spectrum monitoring and compliance, particularly its focus on proactive regulation, interference management, and stakeholder engagement.

To strengthen this framework, BTC recommended that URCA establish a formal process for assessing interference issues. BTC suggested this process include defined response timelines for each stage of interference resolution, prioritisation of cases affecting live services or critical infrastructure, clear escalation procedures and communication channels for licensees, public reporting tools to track resolution progress, and the publication of periodic compliance reports.

BTC emphasised that time is a critical factor when interference impacts active users, and stated that a structured, time-bound process would help ensure the swift identification and mitigation of harmful interference.

- **The CBL Group:** the CBL Group raised concerns regarding interference from maritime vessels, specifically cruise ships and private yachts, affecting its mobile networks. The CBL Group indicated that previous communications on this issue had not yet resulted in a resolution, leading to a belief that URCA may require enhanced monitoring and enforcement capabilities.

The CBL Group emphasised the urgency of this matter, noting that network performance is critical during periods of high traffic, such as when cruise ships arrive. The Group recommended that URCA ensure it possesses the necessary monitoring tools to identify interference sources, the

enforcement capabilities to require compliance with national regulations from vessels, and suitably qualified staff to undertake required investigations.

The response concluded that the unresolved nature of this issue suggests a broader challenge regarding the availability of resources and expertise for spectrum monitoring and enforcement. THE CBL Group expressed its readiness to work alongside URCA to support the development of enhanced capabilities to maintain a secure and reliable telecommunications environment.

- **Kuiper:** No direct response to question 11.

#### URCA's Commentary and Final Position on Consultation Question 11:

- **URCA's Response to Anonymous Respondent:** URCA takes note of Anonymous Respondent's expressed support for its consideration of a more flexible licensing framework.

URCA notes Anonymous Respondent's view that aligning spectrum authorisation terms with the scale, location, and impact of different deployments could facilitate broader participation by both traditional operators and new stakeholders, while supporting innovation and efficient spectrum use.

URCA will continue to assess these perspectives as part of its ongoing review of licensing and spectrum management frameworks, with a view to ensuring that any approach adopted balances flexibility with effective oversight, fair competition, and the long-term interests of consumers and the sector.

- **URCA's Response to The CBL Group:** URCA notes that the CBL Group has again raised concerns relating to spectrum interference from maritime sources. URCA reaffirms its earlier response on this matter, namely that it has engaged directly with the CBL Group, the issue remains under active investigation, and that the geographically dispersed and maritime nature of the complaint necessitates a careful and thorough investigative process. URCA will continue to apply its technical analysis and monitoring of the environment to complaints of harmful interference and will maintain engagement with the CBL Group and other relevant stakeholders until the matter is resolved.
- **URCA's Response to BTC:** URCA has taken note of BTC's request for a formal process for interference issues, including "defined response timelines," "clear escalation procedures," and "public reporting tools" to track resolution progress.

In relation to BTC's recommendations, URCA confirms that all interference complaints are investigated with direct engagement of the relevant stakeholders. URCA emphasises that investigations are assessed on a case-by-case basis, recognising that the nature and complexity of interference incidents can vary significantly and may therefore require different levels of time and resources.

URCA remains committed to ensuring that all investigations are conducted in a manner that upholds the principles of natural justice, while seeking to secure the timely identification and resolution of harmful interference that could impact licensees or consumers.

#### Consultation Question 12: Implementation Plan

*Do you agree/disagree with URCA's proposed implementation approach? What specific risks, milestones, or performance metrics should be prioritised to ensure effective delivery of the NSP 2026–2029?*

#### Summary of Comments for Question 12:

- **Anonymous Respondent:** No direct responses to Question 12.
- **BTC:** BTC considers the implementation plan well-structured but emphasises that the most essential element is clarity on which new bands will be opened and what changes will be made to existing ones. It emphasises the need for transparency, clear milestones, and consideration of cross-border interference.
- **The CBL Group:** No direct responses to Question 12
- **Kuiper:** No direct responses to Question 12.

#### URCA's Commentary and Final Position on Consultation Question 12:

- **URCA's Response to BTC:** URCA affirms the importance of a clear and transparent implementation plan. URCA notes BTC's view that clarity on which new bands will be opened or what changes will be made to existing ones is essential for informed investment planning. URCA notes that the NSP 2026 – 2029, including the National Frequency Allocation Table, sets out the national allocations for radiocommunication services across frequency bands. The consideration of cross-border coordination, and spectrum harmonization remains a priority for URCA and will be a key consideration throughout the implementation process to mitigate potential interference issues, as stressed by BTC.

#### Consultation Question 13: Conclusion and Next Steps

*Do you have any final comments or recommendations regarding the structure, priorities, or implementation of the National Spectrum Plan 2026–2029?*

#### Summary of Comments for Question 13:

- **Anonymous Respondent:** Anonymous Respondent emphasised the importance of Standalone Non-Public Networks (S-NPNs) as critical infrastructure for enterprise digital transformation. Anonymous Respondent stated that Private 5G enables localised control, secure connectivity, and high-performance automation, which unlock operational resilience, reduced energy costs, and innovation in service delivery.

Anonymous Respondent indicated that sectors such as hospitality, utilities, logistics, and healthcare in The Bahamas would benefit from Private 5G, particularly in campus-style

environments where public networks might have limitations. Anonymous Respondent's response noted that these deployments contribute directly to national objectives, including infrastructure modernisation, economic competitiveness, environmental sustainability, and public safety.

Anonymous Respondent suggested that URCA has an opportunity to lead the region by formally supporting enterprise-driven 5G networks. Anonymous Respondent recommended implementing pilot licensing or a regulatory sandbox for localised IMT spectrum to allow controlled validation of Private 5G models before broader rollout. The response concluded by stating that Anonymous Respondent is prepared to participate in such a pilot licensing program to demonstrate operational, technical, and economic benefits.

- **BTC:** BTC viewed the proposed NSP as "well-structured" and "forward-looking," recommending the addition of "clear KPIs, timelines, and visual summaries" to improve understanding and accountability.
- **The CBL Group:** No direct responses to Question 13.
- **Kuiper:** Kuiper reiterated its support for URCA's proposal to enable Non-Geostationary Orbit Earth Stations In Motion (NGSO ESIM) in Ka-band frequencies, consistent with Resolution 123 (WRC-23).

Kuiper further encouraged URCA to consider expanding NGSO ESIM use to include additional Ka-band frequencies, as well as land-based ESIM operations. Kuiper referenced studies by the European Conference of Postal and Telecommunications Administrations (CEPT) which concluded that land ESIM should not raise additional interference concerns when operating in bands available for uncoordinated Fixed-Satellite Service earth stations. The response noted that land ESIM is permitted in the European Union under specific conditions and that Kuiper has already been granted authorisation to operate land ESIM in the United States.

#### URCA's Commentary and Final Position on Consultation Question 13:

- **URCA's Response to Anonymous Respondent:** URCA appreciates Anonymous Respondent's final comments, which highlight the critical role of localised, enterprise-accessible spectrum in enabling digital transformation. URCA has taken note of Anonymous Respondent's offer to participate in a "regulatory sandbox" or pilot program as a valuable opportunity to test new regulatory models in a real-world, controlled environment. URCA notes that it will consider establishing a regulatory sandbox framework through a consultative process.
- **URCA's Response to BTC:** URCA acknowledges BTC's view that the plan is "well-structured" and "forward-looking" and notes its recommendations to add "clear KPIs, timelines, and visual summaries" to improve understanding and accountability.
- **URCA's Response to Kuiper:** URCA thanks Kuiper for its final comments and welcomes its encouragement for further dialogue. URCA confirms its commitment to ongoing engagement with all stakeholders.

### **3. Conclusion and Final Decision**

Having considered the responses to the Consultation Document as expressed within this Statement of Results and Final Decision, URCA has published in ECS XX/2026 the revised and finalised “*National Spectrum Plan 2026 - 2029*” (“NSP 2026 – 2029”). The NSP 2026 – 2029 has been formulated in consultation with The Government of The Bahamas in fulfilment of the requirements set out in Part V of the Comms Act. The NSP 2026–2029 is published as a standalone document and does not form part of this Statement of Results and Final Decision.

From the date of its publication, the NSP 2026 – 2029 operates as the overarching policy and planning framework for spectrum management in The Bahamas. URCA will have regard to the NSP 2026 – 2029 when exercising its statutory functions, including licensing, assignments, coordination, interference management, and related determinations and other regulatory measures, and expects stakeholders to take it into account in their planning and regulatory submissions. For the avoidance of doubt, URCA notes that all spectrum-related decisions, conditions and obligations set by URCA will be aligned with the NSP 2026-2029.

To ensure alignment with international developments, URCA will continue its active participation in ITU and CITELE processes, including preparations for, and participation at, WRC-27. Consistent with section 31(4) of the Communications Act, 2009, URCA will consult with the Minister and submit a revised National Spectrum Plan within three years of each publication.