



**Clear Mobitel (Jersey) Limited**  
**Clear Mobitel (Guernsey) Limited**

C03/19 - Licensing of MFCN in Gibraltar, including 5G

September 2019

## Introduction

Clear Mobitel is a licensed operator in the Channel Islands that has intentions of introducing 5G services. Clear Mobitel is interested in expanding its business and is keen to discover what other regulators policies are with regard to enabling 5G

## Response to Consultation

### **Question 1: Do you agree with, or have any comments on the GRA's proposed amendments in respect of the 3 spectrum ranges?**

Wireless technologies have evolved over time and 5G is the latest iteration of that development. However, 5g is intended to be a facility to enable continuous and seamless connectivity to the internet and to this end requires a broad range of spectrum to best serve that purpose.

Clear Mobitel is in full agreement with the definitions and divisions of the spectrum. It is necessary for all 5G operators to have access to a comprehensive cross section of spectrum to ensure adequate coverage and consequently active competition between providers which will ensure consumer benefit.

### **Question 2: Do you agree with, or have any comments on the proposed introduction of made-to-measure licence conditions?**

Clear Mobitel understands the regulator's requirements in proposing this policy. However, it is important that all competing operators have access to enough spectrum to provide comprehensive coverage and seamless connectivity. The GSMA has published its 5G roadmap<sup>1</sup> which highlights the importance of access to adequate spectrum and the possibility of network sharing to achieve that end.

### **Question 3: Do you agree with, or have any comments on the GRA's proposed channel plan for the sub-band 3400-3600 MHz and conditions of use?**

Clear Mobitel has no objections to the proposed usage of these bands.

<sup>1</sup> <https://www.gsma.com/futurenetworks/wp-content/uploads/2019/03/5G-Implementation-Guideline-v2.0-July-2019.pdf>

**Question 4: Do you agree with, or have any comments on the GRA's proposed plan for the sub-band 3600-3800 MHz?**

Given the restraints identified by the regulator, the proposal appears to be sound.

**Question 5: Do you agree with, or have any comments on the GRA's proposal to consider making spectrum available for MFCN's in the bands above 6 GHz only after WRC 2019 has concluded and relevant documents are published?**

Clear Mobitel considers this to be a pragmatic policy.

**Question 6: Do you agree with, or have any comments on the GRA's proposal to include minimum service levels subject to the proposed usage of the spectrum?**

In order to establish credibility all new operators must have a minimum coverage level in their business plans. It is not therefore unreasonable for the regulator to include such conditions in its policies.

New entrants should however be assured that spectrum is available from all the groups identified by the regulator, to do otherwise would inhibit the ability of a new entrant to meet its coverage targets.

**For the avoidance of doubt, this document may be published in its entirety.**

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To:  
GRA