



15 January 2014

Gibraltar Regulatory Authority
Spectrum Management
Suite 603, Europort
Gibraltar

Re. Public Consultation on the Licensing of 4G Mobile Services & Liberalisation of Mobile Bands in Gibraltar

Dear Sirs,

Thank you for sending to us the information concerning telecom policy developments in Gibraltar.

We have pleasure to respectfully submit the attached responses to the GRA's public consultation document, dated 02 December 2013.

Brymedia is an interested party by way of its proposed participation in a consortium, which intends to submit an early application for telecom operator license/s in the Territory.

Yours faithfully,

A handwritten signature in blue ink that reads "Adrian Wood".

Adrian Wood
Chief Executive

Responses to Public Consultation on the Licensing of 4G Mobile Services & Liberalisation of Mobile Bands in Gibraltar

Question 1: Do you agree with the GRA's evaluation of the 900 MHz band?

6.6 MHz out of 900 MHz band is sufficient for one operator in Gibraltar, but other operators should have equivalence to this.

In general no one operator should be awarded more spectrum capacity than another. Please refer to the discussion paper re. *European Spectrum Limit Policies*, attached to this correspondence.

There should be more 900MHz frequency spectrum available for issue to other licensed operators, which would require more assertive policies in respect of spectrum coordination with nearby countries.

Due to the paucity of 900MHz spectrum in Gibraltar, it is not viable to re-farm any capacity for 4G purposes.

Question 2: Do you agree with the GRA's evaluation of the 1800 MHz band?

It appears that operators in other EU countries are moving to re-farm 1800MHz spectrum. As for the comments under Question 1 above, 16.8 MHz of out the 75MHz 1800 MHz band is inadequate for 4G utilisation.

Question 3: Do you consider the 2100 band suitable for 4G?

We don't consider the 2100 band suitable for 4G, because it's not an international standard and because of inadequate channel availability.

In Brymedia's opinion, the evidence from rapid smartphone data application take-up, and the associated data volumes and speed demands, suggests a minimum of 30MHz of either or both LTE FDD and LTE TDD is necessary for each operator, to produce effective 4G data rates and volumes.

Question 4: Do you agree with the GRA's evaluation of the 800 MHz band?

Yes. However it appears that TV relocation via digitalization will be needed in three countries in the vicinity of Gibraltar.

Question 6: Do you agree with the GRA's evaluation of the 2600 MHz band?

Yes.

Question 7: Should the GRA proceed to liberalize the mobile bands?

Yes.

Question 8: Do you agree with the GRA's position regarding the 700 MHz band?

Yes.

Question 9: Should the GRA research in detail the potential of Spectrum Equalization between local mobile operators before re-farming the 900 MHz & 1800 MHz bands?

Yes, this is necessity to create equal competitiveness for any green field operator. However please refer to Brymedia's remarks above about impracticality of re-farming 900 and 1800 GSM bands, in Gibraltar.

The Territory, in our opinion, has special circumstances that make re-farming of these bands non-viable.

Accordingly, in our view it would be important to make 800 and 2600 spectrum available for 4G/LTE on suitable terms and conditions, to encourage investment by both incumbent operators and potential new licensees.

Question 10: Do you agree with the proposed fee structure?

Yes, we agree that the 4G fees should be in the range of the 3G fee structure.

Question 11: Do you agree with the GRA proposal to include a number of service criteria in the areas outlined above within the 4G license?

Service criteria listed in the consultation document, and our responses, are as follows:

		Brymedia Comments
Launch date:	Obligated to launch commercial services within 9 months after license award	We propose to extend the launch obligation to 12 months after license award
Coverage at launch:	Obligated to provide $\geq 70\%$ pop coverage	Agreed
Population coverage to be achieved in 2 years:	Obligated to provide $\geq 95\%$ pop coverage	Agreed
Mobile broadband data speed provided (minimum):	Obligated to offer download speeds of ≥ 5 Mbps over the networks.	Agreed. However, if the GRA proposes a technology agnostic approach, consideration might be given to minimum speed/s for broadband/4G <u>fixed</u> wireless services.