

China Mobile Peoples Telephone Company Limited

("PEOPLES")

Response to

**Providing Radio Spectrum for
Broadband Wireless Access**

("Third Consultation Paper")

Date of submission: 11 July, 2007

PEOPLES would like to submit its views on the Consultation Paper issued by OFTA on 11 May 2007.

All abbreviations have the same meaning as in the Consultation Paper.

(1) Do you agree that the 2.3 GHz band be allocated for BWA services? If agreed, when the spectrum should be made available?

PEOPLES agree with the allocation of 2.3GHz band. The Consultation Paper has mentioned about some potential technical criteria or constraints for using the 2.3GHz band in Hong Kong to avoid excessive signal overspill to the border areas in Guangdong Province. Peoples suggest that the spectrum should be made available only after these issues are sorted out.

(2) Do you agree that the opening up of the 2.5 GHz band for BWA should be considered at a later stage? If agreed, when and how much of the bandwidth should be made available to the market?

PEOPLES agree. The time and amount of the bandwidth should also be reviewed at a later stage.

(3) Do you have any preferred frequency bands for BWA services? How much spectrum do you need initially and for future expansion (number of blocks, spectrum width of each block, in which bands) and when the spectrum should be made available to the market?

PEOPLES have no particular preferred frequency bands for BWA services as long as suitable infrastructure equipment and user terminals are available.

(4) Do you agree with the proposed frequency allocation plan given in Annex 1? If not, what is your proposal?

PEOPLES agree.

(5) Do you agree that a BWA licensee should be assigned no more than six 5 MHz blocks of the BWA spectrum?

PEOPLES agree.

(6) If the result of the coordination with the Mainland authorities confirms that 85 MHz bandwidth in the 2.3 GHz band can be made available, do you agree that the TA should make available all the 85 MHz bandwidth for BWA service? If not, what is your proposal with reasons?

PEOPLES suggest that 85MHz may be taken as a ceiling. The actual allocation should depend on the market demand.

(7) Do you have any views on the frequency allocation plan for the 2.5 GHz band?

PEOPLES consider that the recommendation and decision from WRC-07 on the allocation of 2.5GHz band will be essential in forming a viable and workable direction.

(8) Do you have any comment on the TA's preliminary view that no restrictions should be imposed on the types of applications and services that may be provided using the BWA spectrum?

PEOPLES agree.

(9) Do you have any further comments on the preliminary view of the TA that he should not prescribe any particular standard or technology for the BWA deployment?

PEOPLES agree.

(10) Do you have any further comments on the TA's preliminary view that assignment of the frequency blocks for BWA services should be made on a territory-wide basis?

PEOPLES support the TA's preliminary view.

(11) Do you have any further comments on the TA's preliminary view that BWA licensees will be required, under the licence, to roll out the services within 24 months from the date when the licence is issued and that performance bond will also be required?

PEOPLES support the view that the TA should impose certain rollout requirements on the licensees. PEOPLES request that these rollout requirements should be stipulated well before the auction and should be reasonable with reference to the latest market situation.

(12) Do you agree with the proposed frequency assignment method as stated above?

PEOPLES agree in principle to a hybrid selection method including a simple pre-qualification and an auction.

(13) Do you have any further comments on the TA's preliminary view that that an up-front lump sum payment basis should be adopted for SUF, the amount of which will be determined through an open auction?

PEOPLES agree in principle to the TA's preliminary view. However, PEOPLES request that the TA provide more details of the 'open auction'.

(14) Do you agree that BWA licensees should not be subject to an ex ante ONA requirement?

PEOPLES agree. However, as the existing 2G and 3G services are licensed on a basis which includes the ONA requirement, it should not be withdrawn from these existing licences.

(15) Do you consider that FMC services should be allocated with new number ranges?

PEOPLES consider that the numbering issues should be reviewed on a broader approach covering all fixed and mobile services together with full Fixed and Mobile Number Portability (FMNP) arrangement.

(16) Do you agree that numbers with prefixes “2” and “3” should be allocated to fixed/“limited mobility” BWA services while numbers with prefixes “6” and “9” should be allocated to “full mobility” BWA services?

PEOPLES agree to the proposal unless and until there is a broader decision on the numbering plan in relation to fixed and mobile services including FMNP.

(17) Do you agree that BWA licensees should be subject to the requirement of facilitating both ONP and MNP, including the FMNP to be introduced in the future?

PEOPLES agree.

(18) Do you agree that BWA licensees should be subject to the requirement of denial of service to suspected stolen apparatus?

PEOPLES agree.

(19) Do you agree with the proposed approach as stated in paragraph 58 to resolve adjacent channel interference issues?

PEOPLES agree.

(20) Do you agree with the proposed guard bands for the 2.3 GHz band? Do you agree with the arrangement for the spectrum holder at the lower edge of 2.3 GHz band to use the spectrum 2.300 – 2.305 GHz as stated in paragraph 60?

PEOPLES agree.