

December 27, 2006

Office of the Telecommunications Authority  
29/F Wu Chung House  
213 Queen's Road East  
Wanchai  
Hong Kong

Attention: TE(R21)

Verizon Wireless appreciates this opportunity to provide comments to the Office of the Telecommunications Authority (TA) with regard to its consultation paper entitled *Licensing of Spectrum in the 850 MHz Band to Enable the Provision of CDMA2000<sup>®</sup> Service*. Verizon Wireless strongly supports the TA's proposal to ensure the availability of spectrum at 850 MHz in Hong Kong that would enable the provision of CDMA2000<sup>®</sup> service after November 20, 2008.

Verizon Wireless is the largest US wireless company based on retail subscribers and revenues. The company headquarters is located in Basking Ridge, New Jersey, USA. The company operates the most reliable wireless voice and data network in the United States, serving 57 million customers.

Verizon Wireless believes that the licensing of a CDMA2000 operator to replace the current ANSI-95 network will increase service offering and competition by giving users a choice of two IMT-2000 technologies. CDMA2000 technologies, such as those deployed by Verizon Wireless in the United States, enable the delivery of a wide range of voice and data services. Verizon Wireless is currently in the process of upgrading its network to CDMA2000 1xEV-DO Revision A, which introduces improvements in data speeds, latencies and quality of service to the CDMA2000 1xEV-DO release (Release 0). The services enabled by CDMA2000 1xEV-DO technologies in Hong Kong will lead to greater consumer choice, and could be a catalyst for increased development of innovative applications for users in Hong Kong and elsewhere. Furthermore, the deployment of CDMA2000 1xEV-DO technology is another avenue by which to provide broadband services to Hong Kong's population alongside existing wired and wireless options.

In addition, Verizon Wireless notes that a CDMA2000 operator in Hong Kong will provide an important service to visitors to Hong Kong from markets including the United States: roaming service. There are more than 350 million CDMA subscribers around the world, including 57 million Verizon Wireless customers, who depend on wireless communication when travelling internationally, and Hong Kong is an important destination for business and leisure travel. Verizon Wireless agrees with the concept expressed in ¶17 that CDMA service should continue to be available to visitors to Hong

Kong, supporting Hong Kong's status as a great world city and a telecommunications hub in the Asia-Pacific region.

Verizon Wireless supports the TA's proposed band plan, creating the potential for a CDMA2000 network in the 825-835 MHz/870-880 MHz frequency range. In particular, we see this as a forward-thinking choice, as it is encompassed in the 824-849 MHz/869-894 MHz band that is assigned to mobile technologies in regions around the world, and is used for mobile services in the United States as well as in Canada, Latin America and the Caribbean, Korea, China, and parts of the Middle East, Africa and Central Asia. The band plan proposed by the TA provides significant potential for harmonization with these markets, and thereby increases the potential for roaming agreements between Hong Kong's CDMA2000 operator and service providers in those markets.

Verizon Wireless would like to again thank the TA for the opportunity to comment on the OFTA's consultation and a very important topic for CDMA operators. Verizon Wireless strongly believes that the introduction of new CDMA2000 network in 850 MHz will benefit consumers and businesses in Hong Kong and will allow Hong Kong to maintain its status as a regional and global telecommunication hub.

Sincerely,

Edward A. Salas  
Vice President, Network Planning  
Verizon Wireless