



**ECTEL - Eastern Caribbean Telecommunications Authority**

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**Attention: "Consultation Document No.01/2021: ECTEL Regional Spectrum Management Plan"**

Dear Sirs,

We are grateful to the Eastern Caribbean Telecommunications Authority (ECTEL) for the opportunity to present our comments on the current state of public policies for mobile services in Dominica, Grenada, St. Kitts & Nevis, Saint Lucia, and St. Vincent & the Grenadines.

The comments expressed by 5G Americas are based upon the following publications<sup>1</sup>:

- "Status of Radio Spectrum Bands in Latin America: 2300 MHz, 2500 MHz & 3500 MHz". May 2021.
- "Status of Radio Spectrum Bands in Latin America: 600 MHz & 700 MHz". June 2020. May 2021.
- "ICT for Disaster Mitigation in Latin America." July 2020.

**Footnote E.10 - Frequency Bands Identified for Broadband Wireless Access Applications (698 – 806 MHz; 2300 – 2400 MHz; 2520 – 2690 MHz; 3400 – 3600 MHz). Q1: Are there any impediments to switching the frequency bands 2.5 GHz, 3.5 GHz 2.3 GHz bands from FDD to TDD? Please identify them.**

Spectrum refarming/reorganization should guarantee that frequency bands are available without harmful interference risks by implementing effective clearing strategies and planning according to the international harmonization of IMT spectrum. National administrations can use different approaches to reorganize or clear spectrum bands, including establishing protection measures, reserving bans on permit extension, and "hard

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<sup>1</sup> 5G Americas is a telecommunications industry association that advocates for promoting and developing a favorable ecosystem for mobile broadband technologies in the Americas. The association is committed to working with government agencies, regulatory bodies, international telecommunications standard development organizations, and other global wireless technology stakeholders throughout the Americas to promote and share knowledge for the successful implementation of mobile broadband technologies. Available on <https://brechacero.com/white-papers/> and <https://www.5gamericas.org/white-papers/>



dates" to relocate services. In addition, it is essential to consider the type of incumbent services, their geographical location, and the allocated capacity to avoid further delays. These strategies have been applied by different national administrations in the planning of the 2.3 GHz, 2.5 GHz, and 3.5 GHz bands that were initially allocated for other services (mainly for fixed applications).

On TDD and FDD planning, the international harmonization of the bands should always be considered:

- **700 MHz:** Different plans exist for the 700 MHz band (APT, FCC) but predominantly in FDD mode.
- **2.3 GHz:** allows both configurations, but the bandwidth is limited (100 MHz or less), and choosing one mode could be more feasible for network deployments. The number of compatible devices with bands 40 and n40 in TDD is expanding. According to the GSA<sup>2</sup>, by December 2020, band 40 had the most significant number of compatible devices for LTE in TDD mode. The band is also standardized for FDD use as bands 30 and n30.
- **2.5 GHz:** many countries in Latin America have planned the band for FDD and TDD use, according to Option 1 of the band plans proposed by the ITU (2570 – 2620 MHz for TDD mode; 2500 – 2570 / 2620 – 2690 MHz for FDD mode). Enough spectrum should be available in both segments to provide sufficient bandwidth for mobile broadband. Band 7 (FDD) has one of the most significant LTE devices already available, and TDD devices exist for bands 41 and 38.
- **3.5 GHz:** it is essential to consider the standardization of the 3.3 – 3.8 GHz band for mobile services in TDD mode as bands n78 and n77 (3.3 – 4.2 GHz). Several countries are planning to use more spectrum in the C-Band outside the 3.4 – 3.6 GHz in TDD mode.

After the WRC-19, a different service category was recognized for the 3.3 – 3.4 GHz band in Argentina, Belize, Brazil, Chile, Colombia, Costa Rica, El Salvador, Ecuador, Guatemala, Mexico, Paraguay, the Dominican Republic, and Uruguay, with allocations to mobile service on a primary basis and as an IMT band. Argentina, Brazil, Guatemala, Mexico, Paraguay, the Dominican Republic, and Uruguay is also attributed to fixed service on a primary basis. In addition, several countries (Chile, Perú, Mexico, the Dominican Republic) allocated FDD blocks in the 3.4 - 3.6 GHz band for fixed-wireless access systems in the 2000s that have now been phased out, requiring refarming processes to allow new IMT applications. 5G

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<sup>2</sup> Global Mobile Suppliers Association.



Americas recommends studying the feasibility of including more spectrum for IMT in the 3.3 – 3.8 GHz range.

**Footnote E.15 - Proposal to permit International Mobile Telecommunications applications in the Frequency Band 614 MHz to 698 MHz. Q3: Are there any opposition to the foot note E.15 i.e. identification of the frequency band 614 MHz to 698 MHz or portions of the band for IMT applications? If yes, please articulate the opposition.**

5G Americas support using the 600 MHz band (614 – 698 MHz) for IMT and applaud ECTEL's initiative to allocate more spectrum for mobile broadband in sub 1 GHz bands (low bands). However, the planning of the 600 MHz should prioritize the effective clearing of the band to prevent the risk of interference. The 600 MHz band is standardized as bands 71 (LTE) and n71 (5G), with mobile devices already available for consumers.

In Region 2, the 600 MHz band is still allocated primarily for broadcasting services (TV). Still, Argentina supports the band's use for IMT applications, Canada, Colombia, Mexico, The United States, Maldives, Belize, Barbados, and The Bahamas. In addition, Chile, Cuba, Guyana, Jamaica, and Panama allocated the band for mobile service primarily, subject to agreements observant of terms established in WRC-15.

5G Americas thanks ECTEL for its attention to bringing its vision on issues related to the development of telecommunications.

Without further ado, I greet you sincerely.

A handwritten signature in black ink, appearing to read "José F. Otero Muñoz".

**José F. Otero Muñoz**

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