



Digicel's Response to the Consultation by the  
National Telecommunications Regulatory Commission of  
the Commonwealth of Dominica on  
ECTEL Regional Spectrum Management Plan

**6<sup>th</sup> August 2021**

We thank you for inviting Digicel to provide its comments on the proposed ECTEL Regional Spectrum Management Plan. Digicel is of course available, and would be happy, to discuss our submission further.

The comments as provided herein are not exhaustive and Digicel's decision not to respond to any particular issue(s) raised in the draft Regulations or any particular issue(s) raised by any party relating to the subject matter generally does not necessarily represent agreement, in whole or in part nor does any position taken by Digicel in this document represent a waiver or concession of any sort of Digicel's rights in any way. Digicel expressly reserves all its rights in this matter generally.

Please do not hesitate to refer any questions or remarks that may arise as a result of these comments by Digicel to: -

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## Dominica

### Question 1:

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.

### Response:

Digicel currently is operating a fixed wireless access network within the 3.5GHz band. However, since the equipment is already using a TDD scheme, the reclassification of the band from FDD to TDD will have no adverse effects on the current service delivery methods. Therefore, Digicel has no issues with ECTEL's recommendation to transition from FDD to TDD for the above mentioned bands.

### Question 2:

Would there be any difficulties to current licensed operators with the proposed changes in the intermediate term (0 to 3 years) or in the longer term (more than 3 years)?

### Response:

Digicel and Flow operate within bands 12 and 13 respectively. Since the proposed changes will be effected in band 14, it will have no adverse effects on either Digicel or Flow.

### Question 3:

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.

### Response:

Digicel is currently operating in Blocks A' + B (704 to 716 MHz / 734 to 746 MHz) of the 700MHz band plan. The starting point of the 700 MHz band plan is 698 MHz (within Block A). In order to preserve the integrity of the uplink of Block A, Digicel is advising ECTEL to refrain from awarding spectrum above 689.5 MHz, to reserve an 8.5 MHz separation so that no filters would be required to eliminate the impact of spurious emissions. Once the 8.5MHz of separation is maintained the future use of Block A within the 700MHz band plan will not be compromised.

If ECTEL cannot maintain the 8.5MHz separation, then at a minimum we recommend that the separation be 4MHz but with the imposition of downlink filters for the 600MHz band and uplink filters for the 700MHz band. The 4MHz minimum separation is the least attractive option, due to the increased

operating costs associated with the added filter components. Costs which the mobile network operators will have to pass on to the consumers.

These recommendations come as a result of several years of battling with radio frequency interference related issues, which arise from the negative interactions of overlapping band plans (like 850MHz (B5) + 900MHz (B8), and 1800MHz (B3) + 1900MHz (B2)) coexisting within the same geographical region. Although Digicel and Flow have been working closely to minimize the impact of such interference issues across the region, it would be best for ECTEL to avoid such issues in the future by carefully limiting the spectrum awards.