



Seva Communications Inc.

John Compton Highway
c/o General Post Office
Castries, Saint Lucia

Phone: 758-452-5163

Email: info@seva.lc

Web: <http://seva.lc>

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Managing Director
ECTEL
P. O. Box BW395,
Gros Islet, LC01 601
Saint Lucia
Fax: 1-758-458-1698
Email: consultation@ectel.int

Dear Managing Director:

Subject: Response to Consultation Document No.01/2021 ECTEL Regional Spectrum Management Plan

SEVA COMMUNICATIONS LTD. (SEVA) is pleased to provide the following comments regarding the following draft proposals from ECTEL.

Proposal for the Reallocation of Digital Audio Broadcast (DAB) service – ECTEL Footnote E.4

Traditionally in the Americas, 174 – 216 MHz has been allocated for Television Broadcasting channels 7 – 13. More recently FCC and others are adopting “In-Band, on-Channel” rules for DAB service, such that existing AM and FM Broadcast station would use their existing channels for DAB. With that in mind, it may be unnecessary to allocate 174 MHz to 240 MHz for DAB purposes.

In our view, the spectrum from 174 – 240 MHz could be better used for Fixed Wireless Broadband use on a no-interference basis to TV broadcasting.

Frequency Bands Identified for Broadband Wireless Access Applications – ECTEL Footnote E.10

With reference to switching the following spectrum frequencies: 698 MHz – 806 MHz; 2300 MHz – 2400 MHz; 2540 MHz – 2690 MHz; and 3400 MHz – 3600 MHz; from FDD to TDD, SEVA generally opposes this move. There is no major advantage of TDD over FDD, and there is existing equipment readily available in each of the frequency bands for FDD Systems but not for TDD systems.

FDD also has a large number of advantages over TDD systems:

- a) For most applications there is a greater need for more downstream data than upstream data. FDD allows for asymmetric split of the frequency band thereby making more efficient use of the spectrum.
- b) Entertainment is a huge favorite for subscribers which can be done using multicasting services. FDD systems allow for multicasting that is not available with TDD systems.
- c) FDD Systems easily allow for higher power for downstream than upstream. This allows for higher modulation data rates thereby allowing more efficient use of available spectrum. With TDD systems power levels are normally almost equal thereby reducing the ability of using higher downstream data rate than upstream data rate.

Due to these advantages SEVA only supports FDD systems.





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Proposal to align ECTEL's 700 MHz band plan to FCC Upper 700 MHz band plan – ECTEL Footnote E.14

SEVA is in favor of the proposed ECTEL revision to allocate the D'-Block (758-763 MHz / 788-793 MHz) to Public Safety applications (Public Protection and Disaster Relief- PPDR) for nationwide emergency response broadband network; and PS Block for deploying and operating the nationwide public safety network for a longer period, as may be suitable for existing providers.

Proposal to permit International Mobile Telecommunications applications in the frequency Band 614 MHz to 698 MHz – ECTEL Footnote E.15

Seva is opposed to the allocation of the 614 – 698 MHz band for cellular mobile use. We contend that the use of that band should be combined with other spectrum in the 470 – 698 MHz spectrum to be allocated for Fixed Broadband service shared with Broadcast Television service. Indeed, we advocate that all **unused** spectrum in the UHF band (470 – 860 MHz) be allowed to be shared with existing services for multi-channel Fixed Broadband Service.

The UHF spectrum has unique propagation characteristics which make that spectrum ideal for the transmission of a combination of multicast television channels and high-speed broadband data, particularly in areas where penetration through dense foliage is required and near-line-of-site conditions are prevalent over longer distances.

We contend that a greater need exists for Fixed Service expansion of service than for Mobile expansion. Indeed, Mobile service seems to be well serviced with ever-increasing spectrum, whereas Fixed service has not had the same consideration, and high-speed Broadband data service to residences and Businesses is where there is a more pressing need.

We hope to address this lack of Fixed Service in the UHF Band in our recent frequency authorization for St. Lucia.

Respectfully submitted,

Karim Lakhani, CEO
SEVA Communications Inc.

