NATIONAL TELECOMMUNICATIONS
REGULATORY COMMISSION
ST. VINCENT & THE GRENADINES

Ref No.: *Cor/ECTEL*

August 19, 2021

Mrs. Cheryl Hector-Fontenelle
Managing Director (Ag)
ECTEL
5th Floor, Conway Business Center
Waterfront
Castries
Saint Lucia

Dear Mrs. Fontenelle,

Re: Consultation on ECTEL Regional Spectrum Management Plan 2021

Your email dated July 9, 2021 refers.

Having reviewed the Consultation document, our NTRC has the following comments.

1. Proposal for the Reallocation of Digital Audio Broadcast Service- ECTEL Footnote E.4- It is proposed that the frequency band 235 MHz -267 MHz no longer be identified for Digital Audio Broadcast service applications and in conformity with ITU Region 2, the frequency band 174 MHz to 240 MHz replace the frequency 235 MHz – 267 MHz for Digital Audio Broadcast applications.

   Our Comment: In St. Vincent and the Grenadines, we have no digital sound broadcasters as we continue to use analog technologies for sound broadcasting. We have no objection to the change in the band from 235 – 267 MHz to be in line with the ITU region 2 band 174 – 240 MHz. We do have analog TV broadcasters using the band 174 – 240 MHz, as such does ECTEL have a transition plan or a band plan in the event that we receive applicants for digital audio broadcasting in the band 174 – 240 MHz in future as the band currently has the incumbent TV broadcasters?

2. Frequency Bands Identified for Broadband Wireless Access Applications- ECTEL Footnote E.10 -ECTEL is proposing that frequency bands for Broadband Wireless Access Applications be revised to conform with the emerging international standards. The

proposal is to revise the following frequency bands to align them with international standards:

- 698 MHz – 806 MHz;
- 2300 MHz – 2400 MHz;
- 2520 MHz – 2690 MHz; and
- 3 400 MHz – 3600 MHz.

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.

Our comments: The current 2012 spectrum plan already outlines a TDD plan for the 3.5 GHz spectrum. The 2.5 GHz plan has options for both TDD and FDD and the 2.3 GHz plan seems to be for TDD. As such with regards to the 2.3 GHz band, there are currently no operators utilizing the band and we have no objections for its alignment with international standards.
With regards to the 3400 – 3500 band, it is noted that the ITU region 2 recommendation has a space to earth allocation. This Region 2 was also in the 2012 spectrum plan; however it is not in the ECTEL spectrum plan. It must be noted, however that there are some operators that receive satellite transmissions in the C band that may suffer from interference from the IMT transmissions.

3. Proposal to align ECTEL's 700MHz band plan to FCC Upper 700MHz band plan- ECTEL Footnote E.14 - ECTEL is proposing a 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. It is also proposed that the prospective licensee will hold be authorised to use both the existing public safety spectrum (763-769 MHz/793-799 MHz) and the reallocated D' Block.

Our comment: The last sentence of the above is not clear. However, there is no objection to the proposed change.

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)?

Our comment: In St. Vincent and the Grenadines there will be no difficulties to current licensed operators in the intermediate or longer term.

4. Proposal to permit International Mobile Telecommunications applications in the Frequency Band 614 MHz to 698 MHz - ECTEL Footnote E.15 - ECTEL is proposing that the frequency band 614 MHz to 698 MHz, or portions thereof, be identified for International Mobile Telecommunications (IMT) in keeping with Resolution 2241 of the ITU Radio Regulations (WRC-19).

Our comment: In St. Vincent and the Grenadines, there are already licensed operators in this band. However, we will not be opposed to the allocation of portions of the band to IMT on a secondary basis.

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.

Our comment: There is no opposition to the footnote E.15.

5. Broadcast standards (Page 166 of plan)

Our comment: The broadcast standards and frequency bands outlined does not address the digital audio broadcast which was outlined as a change in the notes to the document. For the band 174 – 216 MHz could you please clarify if both analog television services and digital audio broadcasting are supposed to be allocated here and if yes are they both primary services.

6. 7.1 AM standards

Our comment: The second paragraph under AM standards is not clear.

7. E.11

The frequency band 5 725-5 825 MHz is designated for use by licence-exempt wireless local area networks and devices for non-commercial purposes operating on low power output levels with appropriately specified technical parameters and based upon not interfering with, or claiming protection from, licensed services.

- 2.4 – 2.4835 GHz.
- 5.150 – 5.350 GHz; and
- 5.725 – 5.875 GHz (Indoor use)

Our comment: E.11 in the draft spectrum plan is not clear. The text refers to the frequency band 5725 – 5825, however below there is a list of different frequency bands which are not clear.

8. Page 164: ECTEL is proposing a 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. It is also proposed that the prospective licensee will hold be authorized to use both the existing public safety spectrum (763-769 MHz/793-799 MHz) and the reallocated D' Block.

Our comment: From the above, it was not clear how ECTEL would have dealt with a situation if a licencee was already assigned spectrum allocated for public safety. However, page 165 clarifies this as no licencees have been assigned spectrum allocated to public safety. Therefore, we have no objection to this.

Page 165: The revision of ECTEL's 700 MHz band plan does not affect the blocks that have been assigned to licensees in the ECTEL Member States namely ECTEL Blocks A', B, C' and D. All licensees who have been assigned spectrum in 700 MHz band prior to the revision of the Plan will maintain the assigned spectrum.

9. Page 7: 3.0 COMMENCEMENT:

Our comment: Recommend that there should be provisions to review and update the plan within 1 year after each WRC.

10. Page 8: 4.2 General Terms

NOTE – If, in the text of a definition below, a term is printed in italics, this means that the term itself is defined in Article 1 of the ITU Radio Regulations.

Our comment: Based on the above note, the terms listed on page 8 which should be italicized since they are quoted based on the definitions of the Article 1 of the ITU RR.

11. Page 8: · 4.2 General Terms

Our comment: The term should read Radio direction-finding (there should be no space between direction and finding).

12. Page 18

Our comment: No need for footnote 1 on page 18 as it is not reference on this page.

13. Page 23: Section 4.8: Permissible interferencel3: -

Our comment: There is a typo here. This should be Permissible interference3

14. Accepted interference3: -

Our comment: *The formatting of the superscript is not in line with the rest of the document.*

15. Page 26: 4.1.1 For the allocation of frequencies the world has been divided into three Regions4

Our comment: *The "4" should be in superscript.*

16. Page 58

Our comment: Footnotes should be clearly referenced for services such as Broadcasting to clearly identify what types of broadcasting can be done in the frequency ranges 76-88, 88 - 100 and 100 - 108 MHz.

17. Page 61

Our comment: *The references to E.14 footnote seem to be incorrect as these are land mobile frequencies. This should have been footnote E.12.*

18. Page 74: The band 698 - 806 has a footnote reference of E.16, however, no such footnote exists. Possibly this should have been footnote E.10.

Our comment: The band 806 - 824 incorrectly references E.15. This should be E.13.

19. Page 160:

a) *Our comment*: *E.6. The term "temporary" should be defined in the document.*
b) *Our comment*: E.9. *This footnote can be clearer to clarify what type of "mobile services" are permitted.*
c) *Our comment*: *Footnote E.10 suggests that the band 698 - 806 MHz can be used.*

20. Page 163:
    Our comment: *E.12 - "3 MH" - Typo exists.*

21. *Our comment: Diagram for Land Mobile Band Plan should clearly state the units for ".0125" spacing. Suggested edit is 0.0125 MHz.*

22. Page 165

Our comment: There is no response to Question 3.

23. Page 167

Our comment: Part f - The STL Band is incorrectly listed. It should be 335.4 -399.9.

24. Page 168- Class A Station: A Class A station is an unlimited time station (that is, it can broadcast 24 hours per day) that operates on a clear channel. The operating power shall not be less than 10 kilowatts (kW) or more than 50 kW.

Our comment It is suggested that the minimum power for a class A station be revised as 10kW seems excessive.

25. On page 5, last sentence of the last paragraph, the word Federation is spelt incorrectly.

26. The blank page on page 6 should be removed.

27. The blank page on 158 should be removed

28. Page 169: 7.2 FM STANDARDS: "The Authority [NTRC] reserves the right to require adjustments to be made to the equipment should it cause interference notwithstanding having been certified previously.
    Major changes in design made to the equipment, other than for the replacement of defective parts, will void the certification unless notified and approved by the Authority

Our comment: We ae in agreement with this.

29. Page 57 (5.180): The frequency 75 MHz is assigned to marker beacons. Administrations shall refrain from assigning frequencies close to the limits of the guardband to stations of other services which, because of their power or geographical position, might cause harmful interference or otherwise place a constraint on marker beacons.

*Our comment: M*arker beacons can be properly explained so that persons understand what is being referred to.

30. Page 161 3.5 GHz band (3400 MHz - 3600 MHz)

    Our comment: *ECTEL can indicate when they plan to adopt a band plan for the 3.5 GHz band that will be based on Time Duplex Division (TDD) time frame structure*

31. The Frequency allocation tables throughout the document has differences between ITU region 2 and ECTEL. We believe we are in region 2 and should adopt all allocations unless there is a reason why these allocations are not being made.

Sincerely yours,

Apollo Knights
Secretary / Director

CC: Executive Director – Mr. Craig Nesty, NTRC Dominica
Coordinator – Mr. Lawrence Samuel, NTRC Grenada
Director – Mr. Ervin Williams, NTRC St. Kitts
Chief Executive Officer (Ag) – Mr. Alden St. Clair, NTRC St. Lucia