

**CABLE & WIRELESS**  
RESPONSE TO

**ECTEL Regional Spectrum Management Plan**

By email to: [consultation@ectel.int](mailto:consultation@ectel.int)  
13 August 2021

## I. Introduction

1. Cable and Wireless, trading as “Flow” is pleased to provide the following comments to the Commission’s consultation document titled ‘*ECTEL Regional Spectrum Management Plan*’ (“**Consultation Document**”) first received July 15, 2021.
2. This response is made on behalf of Cable & Wireless (St.Lucia) Limited; Cable & Wireless (St. Kitts) Limited; Cable & Wireless (Grenada) Limited; Cable & Wireless (Dominica) Limited; and Cable & Wireless (St. Vincent) Limited; Columbus Communications (Grenada) Limited; Columbus Communications( St Vincent & the Grenadines) Limited and Columbus Communications (St. Lucia) Limited.
3. Flow expressly states that failure to address any issue raised in this Consultation Document does not necessarily signify our agreement in whole or in part with the Commission’s position nor the position of any respondent. Flow reserves the right to comment on any issue raised in the Consultation Document at a later date.

## II. Context of Response

4. Flow commends ECTEL for taking the initiative to update the industry, and by extension the public, on the outcome of the World Radio Conferences (WRC), and how the outcome of the Conferences determines the spectrum available in ECTEL countries to facilitate the latest technological offerings to customers. Flow is pleased that the Commission is updating the National Frequency Allocation Table (NFAT) because it tells the industry clearly and without contention, the spectrum resources available for assignment and gives the industry an opportunity to flag important issues for ECTEL’s attention.
5. While ECTEL has a voice and a stake in the WRC deliberations, WRC decisions, even where they affect specific regions, are taken, collectively, by the whole world. Decisions at the WRC are under the auspices of the international framework for the use of the radio frequency spectrum set out in a global treaty – the Radio Regulations - ratified by the Member States of the International Telecommunication Union (ITU), a specialized UN agency. Within that international framework, countries manage their national use of the

spectrum through establishing a NFAT which sets out what radio services can use which frequency bands and under what conditions.

6. Flow has established the foregoing because Flow's comments on the questions in the Consultation Document are within the context of decisions arrived at under a global treaty which cannot be changed until there is another WRC, which is held every four (4) years. Still, national authorities, like ECTEL, do have some limited ability to tailor the use of spectrum through the NFAT. Flow's responses will be limited to those aspects of the NFAT which are within the ECTEL's scope to affect.

7. Technology changes things. WRCs are driven by technological change. The history of the WRC will show that as technology develops, services are substituted, other grow in importance, and some disappear and there is the ever present need to preserve spectrum for non-commercial, public good services. Spectrum has to be identified for all. So truly, Flow must reserve the right to comment on any issue raised in this Consultation Document at a later date.

### **III. Flow's Response to ECTEL's Questions**

8. Therefore, Flow's response to the Commission questions, having established the context is as follows:

<b>Issue</b>	<b>ECTEL's Question</b>	<b>Flow's Response</b>
<i>Footnote E.10</i> Frequency Bands Identified for Broadband Wireless Access Applications	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.	Flow does not anticipate that there will be any impediments to switching the frequency bands 2.5GHz, 3.5GHz and 2.3GHz from FDD to TDD. Flow supports redefining the frequency ranges from FDD to

<b>Issue</b>	<b>ECTEL's Question</b>	<b>Flow's Response</b>
		TDD.
<i>Footnote E.14</i> Proposal to align ECTEL's 700MHz band plan to FCC Upper 700MHz band plan	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)?	In Flow's view there should be no difficulties for operators who have already been assigned spectrum in 700MHz, in the intermediate term. The longer term outlook, however, is more difficult to predict. What we can say is that low band frequency, like 700MHz, is extremely valuable to operators because of its propagation characteristics. As such it must be put to efficient use by public safety and if possible, any spectrum not used by public safety, should be returned for assignment to industry.
<i>Footnote E.15</i> Proposal to permit International Mobile Telecommunications applications in the Frequency Band 614 MHz to 698 MHz	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	Flow welcomes the identification of frequency band 614 MHz – 698 MHz for IMT applications.

9. Reference is made to ITU footnote 5.286AA which states:

**5.286AA** *The frequency band 450-470 MHz is identified for use by administrations wishing to implement International Mobile Telecommunications (IMT) - see Resolution 224 (Rev.WRC-19). This identification does not preclude the use of this frequency band by any application of the services to which it is allocated and does not establish priority in the Radio Regulations. (WRC-19)*

ECTEL explains at E.6 that:

*The band 454.975 MHz - 470 MHz is allocated for point to point links (temporary) for Radio and Television outside Broadcast applications on a primary basis.*

10. Flow recommends that ECTEL investigates the frequency of use and the actual capacity of the band used for television outside broadcast to determine the possibility of identifying the band for IMT, that is for mobile broadband services in accordance with footnote 5.286AA. Flow believes that time is opportune for ECTEL to do such a review and would be consistent with ECTEL's stated key objectives for the consultation viz:

- To revise and update ECTEL's Spectrum Management Policies, including the ECTEL Regional Spectrum Management Plan and Frequency Allocation Tables (FAT). Consideration should be given to emerging wireless technologies and services, to ensure that the radio frequency spectrum is utilized in the most efficient manner for both public and private purposes.
- To develop radio frequency band plans in keeping with the ITU's Radio Regulations for Region 2, for the allocation, assignment and licensing of spectrum to reflect the latest evolution of wireless technologies.
- To develop frameworks to ensure that spectrum is made available for new technologies and services, and flexibility is preserved to adapt to new market needs.

#### **IV. Closing Remarks**

Flow thanks ECTEL for the opportunity to participate in this Consultation. Kindly send any communication in relation to this Consultation Document to:

**Juliet Best**

[Juliet.best@cwc.com](mailto:Juliet.best@cwc.com)

**Melesia Sutherland**

[melesia.sutherland@cwc.com](mailto:melesia.sutherland@cwc.com)

**End Document**