



**National Telecommunications Regulatory Commission
(Grenada)**

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Ms. Cheryl Hector Fontenelle
Managing Director (Acting)
ECTEL
P. O. Box BW395 Gros Islet, LC01 601
Saint Lucia

Dear Ms. Hector Fontenelle,

Re: Draft Regional Spectrum Management Plan - Comments

Further to your request for comments on the Draft Regional Spectrum Management Plan, NTRC Grenada hereby submit 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 240MHz replace the frequency 235 MHz –267 MHz for Digital Audio Broadcast applications.

Response:

The Commission wishes to state that while it is generally in agreement with the changes proposed to be in conformance to international standards, we wish to bring attention to the following.

1. Currently, a portion of the referenced frequency band (174MHz to 216 MHz) is allocated to analog VHF television Broadcast (Channels 7 through 13). Within the said range there are current assignments with active On-Air TV Broadcasting on channels 7,9,10 & 11. Consequently, the Commission recommends that the above existing analog VHF television broadcast frequencies (174MHz to 216 MHz) be protected on a primary basis to prevent any potential interference that may be caused by Digital Audio Broadcast applications.

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2. The remainder of the band from 216 MHz to 240 MHz can be allocated for Digital Audio Broadcast applications.

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.

Response:

1. The Commission has no objection to the allocation of the different frequency bands for the deployment of Broadband Wireless Access Applications.
2. TDD is preferable over FDD. Consequently, the limited spectrum can be effectively allocated to existing and potential operators.

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 authorized to use both the existing public safety spectrum (763-769 MHz/793-799 MHz) and the reallocated D' Block.

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 3years)?

Response:

The Commission has no objection with the correction made to the frequency block allocated for Public Protection and Disaster Relief-PPDR.

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There are no difficulties to the current licenses operators with the proposed changes. The band should be reserved for only Public Protection and Disaster Relief-PPDR.

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).

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

1. With the limitation of spectrum for mobile broadband communication, the Commission has no objection to the foot note E.15 in reallocating the UHV television broadcast band 614 MHz to 698 MHz for the deployment for International Mobile Telecommunications (IMT).
2. The Commission acknowledges that the existing bands (700, 850, 900, and 1900MHz) allocated for mobile communication are limited except for the 1800MHz and the 2100MHz bands which are not being utilized. With the increased demand for mobile broadband communication, the Commission recommends that the 1800MHz and the 2100MHz bands be reformed into the FCC AWS 1 band plan (1710 – 1755 paired with 2110 -2155) to increase the allocation of spectrum for mobile broadband application.

I trust that these comments will be considered by ECTEL.

Sincerely,



Lawrence Samuel
Coordinator