



SUBMISSION FOR THE CONSULTATION PAPER

ON

**NEXT WAVE OF 5G GROWTH & DEPLOYMENT IN SINGAPORE:
POLICY ISSUES & PROPOSED REGULATORY DESIGN FOR 2.1 GHZ BAND**

To:

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Liberty Wireless Pte. Ltd. / **Circles.Life** (“Circles”) thanks the IMDA for inviting us to comment on the proposed regulatory design for the allocation of the 2.1 GHz band for 5G mobile services.

1. Circles agrees with IMDA in recognising the particular value of the 2.1 GHz band as a prime spectrum resource for the delivery of 5G SA benefits in particular to end-users — given its superior propagation characteristics — and agrees that it should be allocated primarily to the provision of 5G services. We also agree with IMDA’s assessment of the optimal uses for the 2.1 GHz band.
2. We also agree that ensuring overall service continuity and minimising disruption for users remains key even as the industry transitions towards 5G, and accordingly, that a small amount of this band should be used to support the continued provision of 3G services.
3. It is in this same spirit that we wish to highlight risks to the first of IMDA’s key policy objectives for the deployment of 5G networks in Singapore: namely, that of “[maximising the] value of 5G for the economy and welfare for consumers”¹.

On the broader implications of the 2.1 GHz allocation exercise

4. While the auction process theoretically makes it possible for the creation of (an) additional nationwide SA network(s) which could lead to the creation of additional competition, Circles believes that it is far more likely that the 2.1 GHz spectrum will continue to accrue to the well-resourced players already in possession of the 3.5 GHz spectrum — reinforcing what we have described before as a 5G “duopoly”².
5. We therefore reiterate our calls for IMDA to consider strengthening the Wholesale Framework to ensure nondiscriminatory access for all interested access-seekers, and prevent anti-competitive practices, particularly as competitive dynamics in 5G mobile services intensify with the ongoing rollout and commercialisation of 5G SA networks.
6. Similarly, given the particular value of 2.1 GHz to end-users in facilitating the provision of superior 5G coverage, Circles urges the IMDA to mandate the provision of 5G wholesale services deployed on 2.1 GHz.

¹ Para 21, IMDA’s Decision on the Policy For Fifth-Generation (5G) Mobile Networks and Services in Singapore, dated 17 Oct 2019.

² Para 42, Circles’ Submission for the Second Consultation Paper on 5G Mobile Services and Networks

On spectrum caps

7. Circles supports IMDA's intent to preclude the monopolisation of 2.1 GHz spectrum by any bidding party. We also look forward to more specificity from IMDA on the "conditions" mentioned in Para 49 of this consultation — such as the return, without compensation, of spectrum exceeding the 5-lot cap when aggregated — that will apply to any approval for MNOs seeking to file separate bids for, but subsequently pool and jointly deploy 2.1 GHz spectrum on the same RAN.

On obligations to ensure no degradation in quality of service

8. With reference to Para 36 of the Consultation, we recommend that IMDA clarify that MNOs' mandatory responsibility to "ensure that there is no degradation in the quality of 3G and 5G services" must also extend in full to their provision of wholesale services to downstream licensees (and their end-users in turn).