

Digiweb Response to IDA of Singapore Consultation

ALLOCATION OF 10.5 GHZ FREQUENCY BAND

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Introduction

Digiweb is an Irish company specialized in providing Internet Broadband Services using a wide portfolio of technologies (DSL, Fibre, Wireless, Satellite, Mobile Broadband). We have been particularly successful in developing an original solution built on the frequency band 10.5Ghz. We are today offering Broadband services up to 10MB for Residential and 30MB for Business using this spectrum. This frequency band is also suitable for cellular backhaul or CCTV solutions.

Question 1: IDA invites views and comments on IDA's proposal to allow the 10.5 GHz band to be used to operate P2P and P2MP radio system, regardless of whether the spectrum is used in the backhaul or access portion of the operator's network.

Digiweb fully agree with the IDA proposal. It's absolutely required to offer the maximum usage flexibility. There are many different applications possible for this frequency band, which could be regrouped under the term "Fixed systems and wireless cameras".

Question 2: IDA invites views and comments on IDA's proposal not to impose any conditions on usage of the 10.5 GHz band for the deployment of access systems and services.

Digiweb agree with the IDA proposal. A long period of research and planning will be required for any new entrant prior to the roll-out of any network. As the market is currently extremely competitive, the IDA should not impose conditions so that the roll-out planning and service design can be carefully carried out.

Question 3: IDA invites views and comments on IDA's proposed technical guidelines on transmission power and unwanted emissions for the deployment of P2P and P2MP radio systems in the 10.5 GHZ band. IDA also invites views on whether there should be a cap on the output power (P).

Digiweb maximum requirement would be 0.4 W output power in order to roll-out its current network. However, we would wish that the IDA do not set additional cap on the output power so that potential new technology may not be power restricted.

Question 4: IDA invites views and comments on IDA's proposal to assign the 10.5 GHz spectrum rights through an auction process based on the same set of auction rules that were designed for the 26 December 2007 Auction.

Digiweb disagree with the IDA proposal. If any online auction option were not perceived as feasible, we would promote a first-price sealed bid option. This method will particularly suits this auction as there are currently a limited number of expected bidders.

Digiweb would intend to minimize any physical presence in Singapore during the auction process.

Question 5: IDA invites views and comments on the proposed terms of the auction.

Digiweb disagree with the proposed term of the auctions in those subjects:

- Spectrum Right Duration: 5 years duration is extremely restrictive and has never been seen before by Digiweb. We would consider 10 year duration as the minimum period in order to give any subsequent value to the license.
- Spectrum Block Size: Digiweb would promote the assignment of 14 MHz Duplex Blocks (350 MHz separation required, Blocks 1-5 ; 2-6 ; 3-7 ; 4-8) otherwise P2MP BWA option wouldn't be applicable.
- Annual Spectrum Management Fee: Digiweb recently acquired a 20 MHz duplex licence in UK in the 10 GHz band for a total amount of £39,000 and for a 15 year duration period. In comparison to UK auction, Singapore minimum fee is greatly overvalued. Digiweb would consider a minimum annual fee of S\$6,000 per block as the upper average benchmark price.
- Reserve Price: As for the annual spectrum management fee, the reserve price is another factor which will turn away many potential applicants. Including management, application and processing fees, **the total annual price for 14 MHz duplex in Singapore is equivalent to the cost of 20 MHz duplex in UK for 15 years.** The IDA should carefully review its reserve price. We would advise this fee to be reduced at a level of S\$ 10,000.

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