

8th June 2012

Ms. Aileen Chia
Deputy Director-General (Telecoms and Post)
Infocomm Development Authority of Singapore
10 Pasir Panjang Road
#10-01 Mapletree Business City
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Soft copy with specified email header to: IDA_consultation@ida.gov.sg

Dear Ms.Chia

Consultation on framework for the reallocation of spectrum for 4G telecommunication systems and services

I would like to thank iDA for the opportunity to comment on the framework for the reallocation of spectrum for 4G telecommunication system and services and I would like to offer the following comments.

Question 1:

IDA seeks views on the proposed allocation of the 1800 MHz, 2.3 GHz and 2.5 GHz spectrum bands.

In general, the 1800 MHz, 2.3 GHz and 2.5 GHz bands are considered suitable for urban deployment, for mobile data capacity. Frequencies below 1 GHz, such as the 700 MHz band, have good propagation and building penetration characteristics, making them preferable for geographical coverage and the implementation of public safety networks.

Question 6

IDA seeks views on its proposed definition of 4G technologies and the proposal to assess on a case-by-case basis alternative technologies to be deployed in the 4G spectrum bands.

Having a definition of 4G will be useful to stakeholders: vendors, operators and consumers.

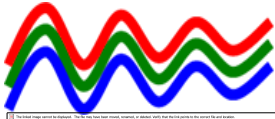
Question 7

IDA seeks views on its proposal that successful bidders of 4G spectrum should meet nationwide 4G systems and service coverage requirements by the dates specified.

iDA should discourage the situation in which a holder of both paired and unpaired spectrum using only the paired spectrum to meet national coverage requirements and leaving the unpaired spectrum unutilised or underutilised.

Question 12

IDA also invites views and comments on the required mitigation parameters indicated in the ECC Report 174 and the regulatory limit proposed by IDA for the co-existence between mobile services in 2.5 GHz with S-band radars.



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ECC Report 174 is based on radio equipment operating in ITU-R Region 1. As we are in Region 3 it may be necessary to require mobile equipment operating in the band 2500 – 2690 MHz to comply with unwanted emissions levels specified for Region 1. Such as CEPT/ERC/RECOMMENDATION 74-01E.

Your sincerely

Khoo Teng Lock
Lock Spectrum Consultancy