28 May 2014

Ms. Aileen Chia
Deputy Director General (Telecoms and Post)
Infocomm Development Authority of Singapore
10 Pasir Panjang Road
#10-01 Mapletree Business City
Singapore 117438

Subject: Consultation paper issued by the Info-Communications Development Authority of Singapore entitled: *Proposed Allocation of Spectrum for International Mobile Telecommunications ("IMT") and IMT-Advanced Services and Options to enhance mobile competition -- 22 April 2014*

Dear Aileen:

We are writing to you today to express Asia Broadcast Satellite's concerns on IDA's above mentioned Consultation paper.

Asia Broadcast Satellite is a member of the CASBAA and is supportive to CASBAA's reply to the Consultation Paper. We are also particularly concerned about the proposed allocation of 3.5GHz band for IMT that is part of the currently assigned for Fixed Satellite Services in the downlink frequencies between 3400-3600MHz. We currently operate a fleet of 6 satellites including for the ABS-2 satellite that was launched in February this year on which we have capacities currently assigned in this frequency band to support Broadcast Services.

For frequencies between 3400-3600MHz, we have a key international broadcaster with its Asia headquarters currently based out of Singapore relying on ABS-2 only for its distribution of their Asia Pacific HD and SD channels. The channels are also being downlinked in Singapore by the key operators for viewership in Singapore.

We understand IDA's intention to ensure optimal use of spectrum for other telecommunication usage but appreciate consideration of protecting the frequency band 3400-3700 MHz such that business of Asia Broadcast Satellite as well as our customer's business will not have a negative impact if part of the frequency band between 3400-3600MHz does not continue to exist for FSS .

Asia Broadcast Satellite together with CASBAA is looking forward to a continuing discussion on this matter.

Thanks and regards,

Asia Broadcast Satellite

Richard C. Pak
Chief Development Officer