



The WALT DISNEY Company  
(Southeast Asia) Pte. Limited

10 June 2014

Ms. Aileen Chia  
Deputy Director General  
Telecoms and Post  
THE INFOCOMM DEVELOPMENT AUTHORITY OF SINGAPORE  
10 Pasir Panjang Road  
#10-01 Mapletree Business City  
Singapore 117438

Dear Ms. Aileen

**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**

I write to you today with Disney's response to IDA's above mentioned Consultation paper.

The Walt Disney Company was incorporated in Singapore in 1995 responding to EDB's invitation and Singapore government organization, MDA and IDA's commitment to support Media Broadcasting Company. Since then, Walt Disney has expanded its Broadcast Center to 20 playout channels uplinking to C-band transponder covering the entire APAC. Besides C-band Satellite uplink, the Broadcast center has added other Media related capability over the years. With the growth to support business needs, the broadcast center employed a 100 strong team, most of the employees are Singaporean.

Disney understand that IDA's objective to review the allocation of spectrum is to ensure the optimal use of scarce spectrum resources, and to facilitate IDA's vision of establishing Singapore as a 'Smart Nation'. However we like to reiterate that the Full C-Band frequency range of 3.400–4.200 MHz currently allocated for FSS use is vital in continuation of Satellite Broadcasting. The advantages of C-Band FSS are;

- 1) In a high rain fade region like Singapore, C-band satellites communication and broadcasting is the only solution that gives broadcaster the high service availability that the industry expects.
- 2) C-band satellites have region-wide coverage that provides essential connectivity to hundreds of millions of receiving ends. This is both difficult and cost prohibitive with terrestrial or sub-sea fiber system.



Disney leverages C-Band frequency extensively for our business needs of contributing and distributing TV content hence we need Singapore's current well-managed and interference free C-Band transmission networks to be maintained for fixed-satellite service ("FSS").

It shall be very difficult if not impossible for IDA's administration to ensure that mobile C-Band IMT type systems operating range are confined "in-building" and not leaking out and interfering with nearby C-band satellite installations.

Disney would like to thank the IDA for the opportunity to comment on this Consultation paper and for its continuing openness to dialogue with industry sectors affected by spectrum policies.

We are also requesting IDA to take due note of the more detailed submission made by CASBAA on behalf of the regional broadcasting and satellite industries.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tan Yee Tiang', written over a light blue horizontal line.

Ms. Tan Yee Tiang  
Vice President, Technology and Operations - Asia Pacific  
Email: yeeti tang.tan@disney.com

CC: Mr. Ang Soo Khoon  
Director of Engineering  
Email: sookhoon.ang@disney.com

Mr. Andrew Noble  
Counsel, Walt Disney Co International  
Email: andrew.noble@disney.com