

To: Aileen Chia (Ms)

Deputy Director-General (Telecoms & Post)
Infocomm Development Authority of Singapore
10 Pasir Panjang Road
#10-01 Mapletree Business City
Singapore 117438

12 August 2015

Re: “Second Consultation on Proposed Framework for the Allocation of Spectrum for IMT and IMT-Advanced Services and for the Enhancement of Competition in the Mobile Market”

Subject: Technical considerations for the allocation of spectrum

In view of the foreseeable development of IoT/M2M applications and adoption in Singapore and potential deployment in this region, we would like to urge IDA to consider allocating some bandwidths of the ISM Sub Giga-Hz Bands ie ETSI (866-869MHz) or/and FCC (920-925MHz) to IoT devices under LPWA Technologies currently widely deployed in Europe, US and certain parts of Asia.

The reason being that LPWA emerging technologies such as SigFox and Lora will speed up the IoT/M2M deployment to complement other existing technologies due to its lower power consumption and long distance features with comparatively lower TOC (Total cost of ownership). Many applications in IoT/M2M are still not cost effective even with 2.5G GPRS or existing cellular networks. Enabling LPWA will be a long term solution and will not only encourage local enterprises to develop innovative products and services for regional markets using Singapore as a hub, but also leverage on a global economy of scale for development of connected devices to make solutions more affordable.

Regards,

Colin Koh

Senior Business Manager – LKH Precicon Pte Ltd
Council Member and Secretary of Singapore Industrial Automation Association
Main Committee Member of IoT Asia Conference (2014/2015)