

## **Draft Technical Specification for Television White Space Devices**

### **StarHub's Comments**

1. Paragraph 5.1.4 - Available TV channels and frequencies for Television White Space ("TVWS") operations are as shown in Table 1.  
StarHub's comments: Currently, there are 3 channels not available for TVWS usage (Ch 25, 26 and 47). By 2020, another 14 channels (Ch 49 to 62) will be removed from TVWS usage. Thereafter, there will only 8 channels available for TVWS usage by all users. Is there any plan for IDA to release more spectrum in the VHF, UHF or 3.5GHz band for TVWS usage? We propose that IDA provides more clarity in this area.
  
2. Paragraph 5.2.1 - The Radio Frequency ("RF") power within the nominal channel shall not exceed the level as determined by an authorised Geo-location Database; or as indicated by a master WSD (which is a fixed or mode II WSD) to the client WSD (mode I WSD) for operations in that channel. The equivalent isotropically radiated power ("EIRP") over the 7 MHz channel bandwidth or 8 MHz channel bandwidth on which the type of WSD is permitted to operate, shall be within the limits as specified in Table 2.  
StarHub's comments: Will IDA consider other WSD modes for Point to point (Microwave similar) or indoor (underground) usage?
  
3. Paragraph 5.2.2 - The WSD shall incorporate transmit power control feature to limit the transmission power to the minimum possible for successful communication.  
StarHub's comments: Will IDA encourage or mandate that power control features be implemented under the WSD specification?