

Please find responses from Singtel given below:

1. In sub-chapter 4.4.1, Singtel recommends to make a change to refer to ETSI EN 301 489-50 [8] standard for all type of CBS – single and multiple technology.

4.4 Electromagnetic Compatibility (EMC) and Equipment Safety Requirements

4.4.1 EMC assessment

For EMC assessment, the CBS shall be classified as equipment for fixed use. This equipment classification is used to determine the applicability of the EMC (emission and immunity) testing requirements based on §5.5 and §7 of ETSI EN 301 489-1 [7]; or §7.5 and §9 of ITU-T K.116 [11].

The ETSI EN 301 489-1 [7] standard shall be used in conjunction with the ETSI EN 301 489-50 [8] standard for CBS that may be capable of supporting two or more radio transmitters of different technologies, operating simultaneously; or processing two or more carriers in a RF bandwidth, with at least one carrier of a different radio access technology.

Singtel would like to proposed new text replacing yellow highlighted text above:

The ETSI EN 301 489-1 [7] standard shall always be used in conjunction with the ETSI EN 301 489-50 [8]. ~~Standard for CBS that may be capable of supporting two or more radio transmitters of different technologies, operating simultaneously; or processing two or more carriers in a RF bandwidth, with at least one carrier of a different radio access technology.~~

Reason for change is a fact, that ETSI EN 301 489-50 [8] standard contains important information for special operating conditions of CBS during test, performance criteria and even some requirements differ.

This change helps to avoid differences in requirements and declaration documents for CBS products compare to Europe.

2. Singtel noticed IMDA has limited the frequency ranges for these bands compare to 3GPP.

3GPP

B 38 2570-2620 MHz

B 40 2300-2400 MHz

IMDA

B 38 2570-2615 MHz

B 40 2300-2340 MHz

It is noted on the spectrum allocation to the mobile industry in Singapore fall under IMDA range. Singtel would like to clarify if final result of the public consultation will turn into type approval for CBS and CMT, and subsequently if this is going to be enforced in the industry for the equipment to be brought into Singapore?

Singtel would also like to counter propose for IMDA to follow the 3GPP standard spectrum allocation, despite of the spectrum allocation in Singapore was not as such wide range according to 3GPP standard.

Thanks.

Best regards,
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