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Aileen Chia (Ms)
Deputy Chief Executive (Policy, Regulation & Competition Development)
Director-General (Telecoms & Post)
Infocomm Media Development Authority
10 Pasir Panjang Road
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RESPONSE TO THE CONSULTATION PAPER ON PROPOSED POLICY FRAMEWORKS FOR THE ALLOCATION OF 800 MHZ, TDD 1900 MHZ AND FDD 2100 MHZ SPECTRUM BANDS

Dear Ms Chia,

Grid Communications Pte Ltd ("GRID") is licensed to provide public digital trunked radio service with island wide coverage. We are existing user in the 800MHz band.

We would like to thank IMDA for the opportunity to provide comments on the "CONSULTATION PAPER ON PROPOSED POLICY FRAMEWORKS FOR THE ALLOCATION OF 800 MHZ, TDD 1900 MHZ AND FDD 2100 MHZ SPECTRUM BANDS".

GRID will focus only on "Section 2: 800 MHz Spectrum Band, Question 1".

GRID welcomes any opportunity to discuss further with IMDA on working towards a more spectral efficient allocation for trunked radio users in the 800 MHz band. Please do not hesitate to contact us if you have any questions.

Yours sincerely,

Bey Kok Meng
Acting CEO
GRID Communications Pte Ltd



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Question 1: IMDA seeks views on the proposed allocation approach for the 800 MHz spectrum band, in particular:

- (a) Whether the proposed lot sizes allow for meaningful use of the spectrum or if there are other alternative combinations of spectrum lot sizes that should be considered for efficiency reasons.**
- (b) Whether the proposed spectrum right duration is adequate from a business viability and investment perspective; and**
- (c) The reasons for you views on the above**

- (a) *Whether the proposed lot sizes allow for meaningful use of the spectrum of if there are other alternative combinations of spectrum lot sizes that should be considered for efficiency reasons.***

As there is a growing trend in enterprise users looking to add on high speed, high bandwidth data application on top of their voice only services, GRID welcomes IMDA's proposal on allocating 2 x 13 MHz spectrum for the LTE-based services.

GRID does not see any compelling reason to pair Lot A and Lot B, Lot A and Lot C and Lot B and Lot C. Separating into three (3) distinct Lots will enable more flexibility in addressing the various users' needs.

GRID welcomes and is supportive of IMDA's recommendation of allocating one lot of 2 x 5 MHz to GRID on a First Rights of Refusal ("**FROR**") basis to minimise impact to GRID's end users.

- (b) *Whether the proposed spectrum right duration is adequate from a business viability and investment perspective; and***

Enterprise users need stringent service quality requirement and secure network features that public mobile networks may not be designed to fulfil these needs. However, these enterprise users only make up a very small portion of the entire mobile users base. Thus, the investment and maintenance cost of a dedicated mobile network for enterprise users will be much higher than a consumer mobile network due to economy of scale and the stringent design requirement.

Therefore, GRID is of the view that a minimum of 10 years spectrum right duration is needed from a business viability and investment perspective.