A summary of the responses to the request for comments concerning the assignment of spectrum in the 1785 – 1805 MHz band.

Issued by the Telecommunications Regulatory Authority
31 July 2007

Purpose: To summarise the comments regarding the request for assignment of spectrum in the 1785 – 1805 MHz band for telecommunications services in the Kingdom of Bahrain.
1 Introduction

This document has been issued following the publication of a Request for Comments (The Request) regarding the "Consideration of request for assignment of spectrum in the 1785 – 1805 MHz band for telecommunications services in the Kingdom of Bahrain". The Request was published by the Telecommunications Regulatory Authority (TRA) on 4 April 2007. The aim of the Request was to gather the views of interested parties on the assignment of spectrum in the 1785 – 1805 MHz band. TRA received six responses in total, addressing both the main issues raised by the Request and related points.

This report sets out a summary of the responses received.

This is a summary document and has no legal effect and is not binding upon TRA. TRA tries to accurately reflect the comments of each party that responded. TRA has not published the content of any document which in the TRA’s view could be considered to be commercially sensitive.
2 Summary of Responses

- TRA received six responses in total.

The main issue on which the Request sought comments was the following:

- The proposals received by TRA and the initial technical evaluation made by TRA.

Three of the respondents were, to varying degrees, against the assignment of the spectrum under discussion, and three were supportive of such an assignment.

The comments received from the respondents against the assignment are summarized below.

1. Three (3) respondents questioned whether a market the size of Bahrain could support another broadband operator. Particular emphasis was placed on the impact on the amount of investment made by existing operators, either on capital expenditure, or service and spectrum licences, or both. The point was also made about a requirement to make a return on any such investments within a suitable time frame.

2. Two (2) respondents highlighted the potential of interference being caused to the licensed GSM 1800 operators currently occupying the adjacent spectrum. Both respondents expressed concern and requested proof that the systems could operate successfully without causing interference.

3. One (1) respondent requested the possibility of a trial, by an independent body, to assess the impact of such a technology on the GSM 1800 band.

4. Two (2) respondents were of the opinion that if such systems were allowed to operate in Bahrain, and subsequently did cause interference, then the responsibility for resolving such problems should be borne by the new operators. This was also to include any problems resulting from changes made to other licensed networks, such as new base stations, moving of base
stations and any other optimisation processes undertaken by the current licensed operators.

5. One (1) respondent recommended assigning this spectrum as a last resort once all other available and suitable spectrum had been assigned.

6. Two (2) respondents recommended that TRA specify stringent spectrum masks, unwanted emission levels, and physical separation distances between radio sites.

7. One (1) respondent reminded TRA that the 1710 – 1810 MHz band has been identified as an IMT 2000 band by the ITU, and that TRA would have to produce a plan for vacating this band in the future.

8. One (1) respondent recommended a detailed study of the experiences of other nations where this technology has been deployed.

9. One (1) respondent recommended that TRA satisfy itself that new spectrum assignments support technologies that are superior in performance and/or service delivery than existing systems.

10. One (1) respondent suggested that far better use could be made of TRA resources by concentrating on affordable access to fibre ducting, international capacity and the introduction of number portability.

The comments received from the respondents supporting the assignment are summarized below.

1. Three (3) respondents supported the assignment of this band for telecommunications services and expressed their interest in becoming a licensed operator utilising this spectrum.

2. Three (3) respondents recognised the need for technical parameters to be specified to ensure existing operators did not experience interference.

3. One (1) respondent recommended that TRA follow the technical specification set out in the European Technical Standards Institute (ETSI) TS 0.5.05 regarding protection levels for GSM systems.
4. One (1) respondent commented that the number of providers of local access in Bahrain is limited, and the assignment of this spectrum would present an opportunity to provide more choice and competition.

5. One (1) respondent commented that should the spectrum be assigned and offered for auction, then the existing mobile and fixed wireless access licensees should be excluded from any auction process.

6. Two (2) respondents recommended that if the spectrum were to be assigned, then only one license should be offered in this band.

7. One respondent commented that TRA should take a technology neutral approach to the assignment of this spectrum.

8. One respondent commented that the band should not be made available on a licence exempt basis as this would result in unacceptable levels of interference.

9. One respondent suggested the establishment of a Technical Planning Coordination Committee from all interested parties in order to facilitate the smooth development of the band in question.

10. Two (2) respondents detailed a range of services that could be offered utilising this technology and spectrum.

TRA would like to thank all who responded to the Request. TRA will take all of the comments and suggestions into account prior to making any decisions regarding licensing and assignments in this band.