

NTT DOCOMO INC.

COMMENTS ON OFCA'S SECOND CONSULTATION PAPER

ARRANGEMENTS FOR THE FREQUENCY SPECTRUM IN THE 1.9 – 2.2 GHz
BAND UPON EXPIRY OF THE EXISTING FREQUENCY ASSIGNMENTS FOR
3G MOBILE SERVICES

11th APRIL 2013

NTT DOCOMO INC. (DOCOMO), an international investor as well as one of the shareholders and roaming partners of Hutchison Telephone Company Limited (HTCL), is pleased to submit herewith comments on the Consultation Paper ("CP") issued by the Office of the Communications Authority ("OFCA") on 28 December 2012 titled "Arrangements for the Frequency Spectrum in the 1.9 – 2.2. GHz Band upon Expiry of the Existing Frequency Assignments for 3G Mobile Services".

In our response to the First Consultation Paper (attached for ease of reference), we explained the reasons why we support Option 1 (license renewal), and why the level of the SUF should be minimized.

We are very concerned about the fact that the Government is continuing to support re-auctioning one third of the current spectrum, as opposed to Option 1. Customer service quality can not be maintained if current operators are forced to relinquish one third of their current spectrum. As stated in our response to the First Consultation Paper, we continue to believe that continuity of customer service should be the primary factor that the Government should take into account when making its decision.

Moreover, if the re-assignment of spectrum occurs, then the current spectrum holders will be required to develop and install corresponding equipments to adapt its radio network to the newly determined frequency range, and it would most likely incur a certain amount of CAPEX. The Second Consultation Paper does not produce any evidence of sufficient benefits which would outweigh the degradation to customer service and the incurring of additional cost which would result from its proposal.

We re-iterate our earlier recommendation that the level of the SUF should be kept to a minimum, for the same reason given in our earlier response.