

## ZTE Suggestion for

Arrangements for Assignment of Additional Spectrum in the 4.9 GHz Band for the Provision of Public Mobile Services and the Related Spectrum Utilization Fee Consultation Paper

2020-09-01

Question 1: Do you have any views on the proposed amendment to the Hong Kong Table of Frequency Allocations as regards the allocation of the 4.80 – 4.83 GHz band to mobile service on a co-primary basis in addition to fixed service, and the 4.99 – 5.00 GHz band to fixed service on a co-primary basis in addition to radio astronomy service?

### ZTE Views:

The proposed amendment to the Hong Kong Table of Frequency Allocations is beneficial for radio communication development.

In addition, changing the allocation from fixed to fixed/mobile is a good choice, as more flexible frequency allocations will lead to higher efficiency of frequency usage.

Furthermore, fixed-mobile convergence is an important trend of telecommunication industry.

Question 2: Do you have any views on assigning the additional spectrum in the 4.9 GHz band by way of auction and allowing all interested parties to apply for participation in the auction?

### ZTE Views:

4.9GHz band is an important spectrum resource for 5G, and the propose allocation from 4.80 to 4.96GHz in Hong Kong is the same range as in mainland China, it will be good for 4.9G industry development.

The way of auction 4.9GHz new block 3 & 4 is good way, and allowing all interested parties to apply the auction is also acceptable , but we suggest that it may be better to offer a higher priority for the new interested MNOs to apply 4.9GHz new spectrum.

Question 3: Do you have any views on the proposal to divide the additional spectrum in the 4.9 GHz band into two 40 MHz blocks?

### ZTE Views:

This proposal is good for Hong Kong 4.9GHz spectrum utilization, too small bandwidth divide for 4.9G additional spectrum is not good for development and utilization. And If the two non-incumbents MNOs are not interested to apply for the two new 40 MHz blocks, then the two blocks can be open to the incumbent 4.9GHZ MNOs to apply.

Question 4: Do you have any views on the proposed spectrum cap of 40 MHz to be imposed on each bidder?

**ZTE Views:**

As 4.9GHz industry for 5G still under development, having more spectrum in hand will lead them to invest more to utilize the spectrum.

We prefer to suggest that:

- 1) If the two non-incumbent MNOs are interested to apply 4.9GHz, they shall have a higher priority to apply.
- 2) If no more MNOs to apply this time, the incumbent 4.9GHz MNOs can be apply another 40MHz (total 80MHz).

Or only one existing assignee of 4.9 GHz can get additional 4.9 GHz spectrum resource. In fact, existing two assignees of 4.9 GHz holds more bands than other two MNOs.

Question 5: Do you have any views on adoption of the SMRA auction format for the assignment of the additional spectrum in the 4.9 GHz band?

**ZTE Views:**

Using SMRA auction format is good for each bidder.

Question 6: Do you have any views on the network and service rollout obligations proposed to be imposed on the successful bidders of the additional spectrum in the 4.9 GHz band, and the associated performance bond (in the case of new assignees of spectrum in the 4.9 GHz band) or undertaking (in the case of existing assignees of spectrum in the 4.9 GHz band) proposed to be provided by successful bidders to secure compliance?

**ZTE views:**

We are also suggest to given the successful bidders to be imposed the network and service rollout obligation in the first five years, it is a good way to use the associated performance bond, it will help to develop 4.9G industry and maximize 4.9G spectrum utilization.

Question 7: Do you have any views on the proposal in relation to the setting and collection of SUF as specified in paragraphs 30 and 31 above?

**ZTE Views:**

As 4.9GHz industry for 5G still under development, to encourage the successful bidders to utilize the spectrum , SUF for 4.9GHz shall be keep in a reasonable pricing.