

**The Views and Comments of China Mobile Hong Kong Company Limited  
("CMHK")  
on Consultation Paper of OFCA issued on 27 July 2017**

for

**"Proposed Change in the Allocation of the 3.4 – 3.7 GHz Band  
from Fixed Satellite Service to Mobile Service"**

**Question 1: What are your views on the above Proposed Re-Allocation?**

China Mobile Hong Kong supports the Proposed Re-Allocation as given in Figure 1.

**Question 2: Do you agree with the principle of protecting existing SMATV/EFTNS/SPETS systems operating in the adjacent band of 3.7 – 4.2 GHz with the implementation of the mitigating measures?**

In general CMHK agree the principle. Any rectification work should be arranged in a co-operative manner between concerned mobile and satellite systems operators, in case of interference occurred. As mentioned in paragraph 32, the installation of SMATV/EFTNS/SPETS is scattered in Hong Kong, it is difficult for mobile operators to estimate the impact on radio base stations at this moment without more information. It is suggested that OFCA should conduct a study on the effectiveness of proposed mitigating measures by SMATV/EFTNS/SPETS systems operating in 3.7 – 4.2 GHz, and the potential constraints imposed on the deployment of radio base stations in 3.4 – 3.6 GHz.

**Question 3: For implementation of the Proposed Re-Allocation, please suggest or give your views about any mitigating measures to be implemented for the existing systems and services as well as any precautions to be taken for the operation of the new mobile base stations to be operating in the 3.4 – 3.6 GHz band.**

Radio base stations are usually installed at the rooftop of buildings in Hong Kong. CMHK agree with the requirement of mitigating measures to be implemented by the existing systems and services that are relocated to 3.7 – 4.2 GHz band.

To avoid potential interference, mobile operator can also consider lower radio base stations to street level. However, finding a suitable location for radio base station at street level is difficult. Radiation concern and limited space are typical difficulties which needs to be overcome. Lamp pole is an option suitable for radio base station installation. However, the current installation requirement and application process of base station installation at lamp pole have deterred the lamp pole site development. It is suggested that OFCA can take the initiative to review and improve the existing installation guidelines, in order to facilitate fast deployment of radio sites at lamp pole.

**Question 4: What are your views on effecting the Proposed Re-Allocation in the early 2020, giving an advance notice period of two years if the relevant decision of the CA is made in early 2018?**

As 5G network standard and deployment in some countries will begin in year 2020 or earlier, CMHK propose to effect the proposed re-allocation in January 2020 regardless of when the relevant CA decision is made. With this consultation, all stakeholders should have already been notified and prepare for the possible changes. It's also important that OFCA can follow the proposed time schedule to reach CA decision in early 2018.

**Question 5: What are your views on the need to protect the TT&C channels of the licensed satellite networks at their specific locations from any harmful interference to be caused by public mobile services?**

It introduces operational difficulties to both mobile operators and licensed satellite networks operators. Referring to paragraph 20 and remark 10, TT&C Stations are located in Tai Po Industrial Estate and Stanley. It is expected that Tai Po Industrial Estate will receive mobile signal easily and interference may affect both mobile users and TT&C stations. Stanley may have a better control on interference. It is suggested that most operations of TT&C stations should be concentrated at Stanley, and use Tai Po Industrial Estate as the backup site.

It is also suggested that OFCA can conduct a study to evaluate the potential constraint imposed on the deployment of mobile base station in these areas for the protection of TT&C stations from interference.

**Question 6: Do you have any views on other aspects of or issues relevant to this consultation?**

No, CMHK do not have any views on it.