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Office of the Communications Authority
29/F, Wu Chung House
213 Queen's Road East
Wan Chai, Hong Kong
Attention: Head, Regulatory 3

22 August 2018

RE: GSMA's comments to the consultation paper on the "Proposed Allocation of the 26 GHz and 28 GHz Bands to Mobile Service and the Associated Arrangements for Spectrum Assignment and Spectrum Utilisation Fee"

Dear Sir/Madam:

The GSMA would like to thank the Hong Kong Communications Authority (CA) for the opportunity to comment on the consultation for the *Proposed Allocation of the 26 GHz and 28 GHz Bands to Mobile Service and the Associated Arrangements for Spectrum Assignment and Spectrum Utilisation Fee*.

In response to the questions raised in the consultation paper, we would like to provide the following comments, where appropriate, for your kind consideration.

Question 1: What are your views on the proposed allocation of the 26/28 GHz bands to mobile service and of the sub-band of 24.25 – 24.45 GHz to fixed service, both on a primary basis? What are your views on the protection of radio stations of co-primary users on a first-come-first-served basis?

The GSMA welcomes the proposed allocation of the 26/28 GHz bands to mobile service and of the sub-band of 24.25-24.45 GHz to fixed service on a co-primary basis. The release of both 26 & 28 GHz bands will help the operators in Hong Kong provide citizens and businesses world-class 5G services and innovations.

In the ITU-R Radio Regulations, co-primary services have equal priority in the band. The GSMA is concerned with the proposed protection of co-primary users on a first-come-first-served basis, because this effectively creates superior priority of one co-primary service over another and is against the rules set out in the Radio Regulations. The GSMA would recommend the CA to remove the proposal for protection on a first-come-first-served basis but instead restore equal priority for co-primary users in the 26/28 GHz bands.

Question 2: Do you have any views on adopting an administrative assignment approach for the release of spectrum in the 26/28 GHz bands?

The GSMA supports the proposed administrative approach in this case to facilitate more timely release of spectrum to the industry.

Question 3: Do you have any views on the proposed band plan with frequency slots of 100 MHz each?

The GSMA supports the proposed frequency slots of 100 MHz each.

Question 4: Do you have any views on the proposal of assigning (a) 3 300 MHz to 3 700 MHz of spectrum in the 26/28 GHz bands for the provision of large scale public 5G services; and (b) the remaining 400 MHz to 800 MHz of spectrum in the two frequency bands to other entities for the provision of 5G services in specified locations on a shared basis?



The GSMA would urge the CA to firstly prioritise the assignment of full spectrum in the 26/28 GHz bands for the provision of large scale public 5G services, and only consider regulatory provisions of flexible and non-mandated “Shared Spectrum” if there will be left-over from the assignments for large scale 5G services. Economy of scale has been a crucial factor in the success of mobile broadband, and in the 5G era we would recommend the CA to continue promote scale instead of fragmentation. For localised services, licensees of large scale 5G services can also provide tailored solutions utilising their strong experiences in networks and services. The GSMA would therefore recommend the CA to remove the restriction and allow operators of large scale 5G services to provide services in Shared Spectrum if there is any. Moreover, the CA should allow the operators to decide if and how the spectrum will be used for specified location service according to user demand.

Question 5: Do you have any views on the proposed caps of (a) 800 MHz of spectrum in the 26/28 GHz bands for spectrum designated for the provision of large scale public 5G services; and (b) 400 MHz of the Shared Spectrum designated for the provision of specified location services?

MNOs are better placed to respond to this question.

Question 6: What are your views on the proposed method of assigning spectrum in the 26/28 GHz band to qualified applicants for the provision of large scale public 5G services?

The GSMA would urge the CA to firstly prioritise the assignment of full spectrum in the 26/28 GHz bands for the provision of large scale public 5G services and allow the operators to decide if and how the spectrum will be used for specified location service according to user demand.

Question 7: Do you have any preference on the assignment of spectrum in either the 26 GHz or 28 GHz band?

MNOs are better placed to respond to this question.

Question 8: What are your views on the proposed assignment method for the Shared Spectrum?

The GSMA would urge the CA to prioritise the assignment of full spectrum in the 26/28 GHz bands for the provision of large scale public 5G services, and only consider regulatory provisions of flexible and non-mandated “Shared Spectrum” if there will be left-over from the assignments for large scale 5G services. If there will be left-over spectrum for shared use, the GSMA will again urge the CA to remove the restriction and allow licensees of large scale 5G services to provide services in Shared Spectrum. Moreover, the CA should allow the operators to decide if and how the spectrum will be used for specified location service according to user demand.

Question 9: What are your views on the network and service rollout obligations proposed to be imposed on the use of spectrum assigned for the provision of large scale public 5G services?

Access to sites, in particular street level furniture such as lamp posts, payphone booths and other installation sites, will become increasingly difficult due to the larger number and denser deployment of small cells expected for 26/28 GHz bands. While the network and rollout obligations need to be practical and realistic, the GSMA would also encourage the CA to provide assistance to operators to gain access to sites in order to fulfil their obligations.



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Question 10: What are your views on the proposed performance bond for guaranteeing compliance with the proposed network and service rollout obligations for using spectrum assigned for the provision of large scale public 5G services?

MNOs are better placed to respond to this question.

Question 11: Do you have any views on the proposal for SUF as set out in paragraphs 45 to 50 above?

The GSMA welcomes the CA's proposal set out in this consultation paper.

Once again, the GSMA appreciates the opportunity to comment on this consultation issued by the CA. We are keen to continue the close dialogue with the CA on the above matters, and looks forward to continue working closely with the CA to enable 5G Hong Kong.

Yours sincerely,

A handwritten signature in blue ink, appearing to be "Joe Guan".

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Copy to:
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About the GSMA

The GSMA represents the interests of mobile operators worldwide, uniting more than 750 operators with over 350 companies in the broader mobile ecosystem, including handset and device makers, software companies, equipment providers and internet companies, as well as organisations in adjacent industry sectors. The GSMA also produces industry-leading events such as Mobile World Congress, Mobile World Congress Shanghai, Mobile World Congress Americas and the Mobile 360 Series of conferences.

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