

HGC GLOBAL COMMUNICATIONS LIMITED

SUBMISSION IN RESPONSE TO CONSULTATION PAPER ON PROPOSED ALLOCATION OF THE 26 GHZ AND 28 GHZ BANDS TO MOBILE SERVICE AND THE ASSOCIATED ARRANGEMENTS FOR SPECTRUM ASSIGNMENT AND SPECTRUM UTILISATION FEE

1. HGC Global Communications Limited (“**HGC**”) welcomes the opportunity to submit its view on the consultation paper entitled “Propose Allocation of the 26 GHz and 28 GHz Bands to Mobile Service and the Associated Arrangements for Spectrum Assignment and Spectrum Utilisation Fee” jointly issued by the Secretary for Commerce and Economic Development (“**SCED**”) and the Communications Authority (“**CA**”) on 26 July 2018 (“**Consultation Paper**”).
2. While we support the spectrum assignment of 26/28 GHz bands administratively for the provision of 5G services in Hong Kong, we are mindful that since the spectrum will be assigned by way of allocation, the Administration must ensure effective utilisation of such assigned spectrum. Proper requirements and restrictions must be in place to safeguard public interests and fair competition for all entities interested in providing 5G services in Hong Kong.
3. As we envisage that mobile network operators (“**MNOs**”) are likely to occupy the majority if not all of the bandwidth available in the 26/28 GHz bands for the upcoming assignment exercise, HGC submits that interested MNOs should be subject to such application criteria that any assigned spectrum will be limited to the sole use of provision of mobile 5G services, and that the type of services offered on the assigned spectrum will not overlap, affect or interfere with any fixed services.
4. We also acknowledge that the core applications of 5G services are geared towards mobile telecommunications. However, service offerings under the umbrella of 5G should be awarded equal attention in the interests of the public at large.
5. In this connection, HGC is of the view that the licensing regime and requirements should cater for the nature and characteristics of such 5G services, be it mobile or non-mobile, to be offered. As an illustration, the issuance of a Public Radiocommunications Service Licence, which is in substance a mobile telecom licence, for a successful applicant of the Shared Spectrum (as defined in the Consultation Paper) may not be appropriate if the Shared Spectrum assigned is intended for deployment of non-mobile 5G services.

6. HGC is supportive of the introduction of 5G services in Hong Kong. To facilitate healthy development of 5G services, the Administration has the duty to make available suitable spectrums to interested entities in a manner that is fair and appropriate for different types of intended use cases.

Submitted by
HGC Global Communications Limited
22 August 2018