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Confidential

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Re: Response to

**Arrangements for Assignment of the Spectrum in the
600 MHz and 700 MHz Bands for the Provision of Public Mobile Services
and the Related Spectrum Utilisation Fee
Consultation Paper**

Dear Sir,

I write to response to the above captioned matter as follows

1. First of all, the cellular market had long been saturated since the era of 3g/4g and the air-tariff growth had virtually cased to grow since then.
2. Without new “down-to-earth” applications, the introduction of 5g may not be able to change such saturation.
3. The only benefit party is the manufacturer, by selling more “redundant equipment” without new applications nor any “obvious down-to-earth” superportity to the predecessors (3g/4g).
4. As 5g had been allocated in the GHz frequency band already, additional band allocation deems un-necessary and bring no benefit to OFCA nor the community at all.
5. The frequency band of 600MHz and 700MHz should be reserved for new innovation and applications. For example, the new emerging 0-RAN (5g open system of the cellular) is an emerging competitor to the conventional 5g RAN. As I understand it, the Hong Kong Government ASTRI had also developed such systems and would like to deploy it.
6. The new trend of cellular may move toward de-centralized and distributed systems accomplished by “private / semi-public 5g network” embedded with the MEC and IoT functions, a new mode of application & business development.
7. In conclusion, the 600M/700 MHz band is recommended to be reserved for new application and new business development, in a form of private and/or public band, and/or in public sub-band mode (such as in MTR operation mode, AA, HA might consider this as well; not to mention Police/Fire).

Thank you for your attention.

Regards
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