

## **HKISPA's Response to consultation paper on "Licensing Framework for Deployment of Broadband Wireless Access"**

### **Executive Summary**

Hong Kong Internet Service Providers Association ("HKISPA") agrees with OFTA that the offer of BWA spectrum for deployment by the telecommunications industry should be commenced as soon as by 2006.

### **Introduction**

HKISPA welcomes to respond to the consultation paper on Licensing Framework for Deployment of Broadband Wireless Access – Analysis of Comments Received, Preliminary Conclusions and Further Consultation ("Second Consultation Paper").

### **Deployment of BWA**

HKISPA realizes the urgency in requiring and deploying BWA and agrees with the Authority that the offer of BWA spectrum for deployment by the industry should be facilitated as soon as possible, with a view to assignment of the relevant spectrum of successful bidders in the year of 2006.

In addition, HKISPA has the same opinion as OFTA that the delay in deployment of BWA, pending the result of fixed mobile convergence and spectrum policy reviews, should be unnecessary and not be tolerated. Meanwhile, in the sake of interests in assurance of policy coherence and certainty, HKISPA shows its support to speed up the spectrum policy review.

Moreover, in the view of successful trial runs of BWA in town and benchmarking the enforcements in actively deploying BWA in overseas countries, HKISPA finds no excuse for the delay in deployment of BWA in Hong Kong.

Subsequent to successful technical trial runs of BWA in Hong Kong conducted by local telecom companies, BWA has proven itself as feasible to be rolled out throughout the town and to act as the alternative mean to wireline local access.

Benchmarking the recent and successful commercial deployments of BWA by service providers in overseas countries of Europe, Asia and the northern America, we strongly believe that it is necessary for OFTA to assign BWA spectrum in Hong Kong, allowing the local telecommunications industry to keep up with the global trend and pace of broadband developments.

### **Standard Issues**

HKISPA concurs OFTA to allow the deployment of any technology which conforms to recognized open standards, for the delivery of BWA services.

### **Spectrum Issues**

Regarding the suitability of 3.5 GHz Band for BWA Deployment in Hong Kong, HKISPA shares the same view of OFTA that if the market considers using licence-exempt bands is a viable alternative for BWA, consideration will be given to permitting such development under a class/individual licence.

### **Number of Frequency Blocks to Be Assigned**

HKISPA is of the opinion that a territory-wide frequency assignment should be mandatory as regional basis is impractical depending on how big or small the cell size is and it will also lead to breaking the mobility feature and making cell handoff extremely complicated involving interconnect (business & technical) arrangement. In fact one of the drivers to implement BWA is to make up the discontinuation of “Type II Interconnect” in 2008.

### **Licensing Issues**

#### ***Scope of Permitted Services***

HKISPA believes that there should be no restriction in the scope of permitted services of the future BWA licences. Both fixed telecommunications services and full mobility services could be developed upon the initial deployment of BWA in Hong Kong.

#### ***Assignment of Telecommunications Numbers and Interconnect Regime***

HKISPA finds that telephone numbers with prefixes of “2” and “3” should be allocated for all telecommunications services using the BWA spectrum, regardless fixed telecommunications services, telecommunications services of limited mobility or any other telecommunications services.

### **Spectrum Utilisation Fee and Assignment of Spectrum**

HKISPA believes that the assignment of BWA spectrum should be by beauty contest. It would be impractical to have unlimited number of licenses in terms of spectrum assignment.

HKISPA also concurs that a spectrum usage right of 15 years should be granted to a successful bidder of BWA spectrum.

**Hong Kong Internet Service Provider Association**

**21 November, 2005**