Annex 1 Digi Telecommunication response to Public Consultation on Proposed Malaysia's Positions for WRC-19 Agenda Items

No.	Agenda Item	Proposed Malaysia (MLA) Views and Positions			
Work	Working Party 1: Land Mobile and Fixed Services				
1.	1.11	Digi supports harmonisation of global or regional frequency for RSTT through the development of relevant ITU-R Recommendations and/or Reports and without specifying frequency ranges in the Radio Regulations.			
2.	1.12	Digi supports harmonisation of global or regional frequency for ITS. Digi is of the view that harmonisation can be achieved by using ITUR Recommendation as reference and without specifying frequency ranges in the Radio Regulations.			
3.	1.14	Digi support ITU Study, however the band to be allocated and prioritise to Terrestrial IMT.			
Working Party 2: Broadband Applications in the Mobile Service					
4.	1.13	Digi support for the identification of the terrestrial component of IMT in the following frequency bands: • 24.25 to 27.5 GHz; • 37 to 40.5 GHz; • 40.5 to 42.5 GHz; • 42.5 to 43.5 GHz; • 47.2 to 50.2 GHz; • 50.4 to 52.6 GHz; and • 66 to 71 GHz			
		We further support following methods for the bands above:			
		24.25 to 27.5 GHz: Method A2 Alternative 2 The 26 GHz band is adjacent to the 28 GHz band, allowing wide harmonisation, low handset complexity, economies of scale and early equipment availability. The 28 GHz is already being used for 5G in the US, South Korea whilst other countries such as Japan and Canada are in the planning stage.			
		37-40.5GHz , 20.5-42.5 and 42.5GHz Method C2, D2 and E2 (Alternative 2) Identifying these frequency band for the terrestrial component of IMT in Regions or globally. Identifying the whole range from 37-43.5GHz for IMT enables for globally harmonized tuning range allowing flexibility for countries to			

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		pick and choose those part they wish to make use of. This allows for different countries and regions choose which part to implement and deliver harmonisation of equipment. It will therefore help drive the economies of scale needed to lower equipment costs.
		47.2-50.2 GHz: Method H2 Alternative 2 Identify the 47.2-50.2 GHz frequency band for the terrestrial component of IMT in Regions or globally.
		50.4-52.6 GHz: Method I2 Alternative 2 Identify the 50.4-52.6 GHz frequency band for the terrestrial component of IMT in Regions or globally
		66-71 GHz: Method J2 Alternative 2 Identify the frequency band 66-71 GHz for the terrestrial component of IMT in Regions or globally. Remove the frequency band 66-71 GHz from RR No. 5.553.
		Digi wish to highlight additional band as below to be identify for IMT: 1. C-band 3.3 to 3.8 GHz 2. 28 GHz The proposal is in line with the recommendations by the 5G Spectrum
		Working Group under the National 5G Task Force. Both frequency bands had gained traction and global adoption for 5G. It would be beneficial for Malaysia to adopt the same frequency band as it provide the economics of scale and immediate availability of ecosystem.
5.	1.16	Digi support sharing and compatibility study conducted by ITU-R.
6.	9.1 (Issue 9.1.1)	Digi support for the ITU-R to complete the study, however, the IMT satellite band is currently in between the 2100MHz band mobile terrestrial allocation. Protection to the adjacent band (FDD and TDD-will use it when the eco-system is ready) and no restriction parameter should be imposed to mobile terrestrial.
7.	9.1 (Issue 9.1.8)	Digi is of the view that any regulatory action is not required in the Radio Regulations with respect to specific spectrum for the use of narrowband and broadband MTC in the Radio Regulations, as concluded in the CPM Report.
		There may be other ways to address the harmonized use of spectrum to support the implementation of narrowband and broadband MTC. The study of technical and operational aspects including the potential harmonized spectrum usage to support the implementation of narrowband and broadband MTC infrastructures could be further accomplished through the course of the work in ITU-R Study Groups including the development of ITU-R Recommendations, Reports and/or Handbooks, as appropriate.

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Working Party 3: Satellite Services				
8.	1.5	Digi support the protection for the current existing services.		
9.	9.1 (Issue 9.1.2)	Digi supports the protection of IMT in region 1 and 3		
10.	9.1 (Issue 9.1.9)	Digi supports the allocation for IMT		
Working Party 6: General Issues				
11.	10	Consider additional IMT band in the 5.925 to 7.125 GHz for WRC-19.		