

## **PUBLIC INQUIRY OF ALLOCATION OF SPECTRUM BANDS FOR MOBILE BROADBAND SERVICE IN MALAYSIA**

**Responder: SACOFA Sdn. Bhd.**

<b>Question</b>	<b>Comments/Responses</b>
<b>1.</b>	<ul style="list-style-type: none"> <li>i. Award mechanism shall be based on auction. There should be roll-out obligations so that there is no hoarding of spectrum. There should be mandatory rural component to be rolled out in specified time in this band as this is suitable for rural eMBB application. There should not be any restriction in the technology in the band.</li> <li>ii. The timeline for the assignment is "as soon as possible".</li> </ul>
<b>2.</b>	There are two options for 700MHz Band 28 or Band 44. Both options are supported by handset shipset vendors. The ideal spectrum block should be in 20MHz and there should be an option to bid for more than one block and can be bid concurrently.
<b>3.</b>	<ul style="list-style-type: none"> <li>i. Award mechanism shall be based on auction. There should be roll-out obligations so that there is no hoarding of spectrum. There should not be any restriction in the technology in the band.</li> <li>ii. The timeline for the assignment is "as soon as possible".</li> </ul>
<b>4.</b>	The allocation shall be based on time division duplex in Band 40. The ideal spectrum block should be in 20 MHz and there should be an option to bid for more than one block and can be bid concurrently.

<p><b>5.</b></p>	<ul style="list-style-type: none"> <li>i. Award mechanism shall be based on auction. There should be roll-out obligations so that there is no hoarding of spectrum. There should not be any restriction in the technology in the band.</li> <li>ii. The timeline for the assignment is "as soon as possible".</li> </ul>
<p><b>6.</b></p>	<p>The allocation shall be based on time division duplex in Band 41. The ideal spectrum block should be in 20 MHz and there should be an option to take more than one block and can be bid concurrently.</p>
<p><b>7.</b></p>	<p>SACOFA proposed that it shall be based on reasonable price such that Cost/MHz/Citizen shall be minimum. The fees should be lower for the higher frequency band as the amount of capital investment needed to cover a similar area with larger band is higher and hence there should be incentive to pick larger bands built into the fees model.</p> <p>Operators should be able to obtain exclusive spectrum in any of the above bands for providing/investing in critical wireless infrastructure that will enable end user service delivery for various Network Applications and Service Providers. To bridge the digital divide economically in very sparsely populated, difficult to reach rural areas, the spectrum cost to be commensurate factoring these challenges. The assigned spectrum will be used to provide wireless broadband infrastructure for delivery of guaranteed, high QoS and fixed always-on essential services and applications.</p> <p>SACOFA will also like to offer shared RAN sharing service for all the mobile broadband operators. The spectrum auction procedure should specify this option as well and should not restrict such deployment model.</p>

If the assigned operator failed to meet the obligation of providing rural connectivity (at non commercially viable area) as per guidelines by MCMC, within the given time frame, MCMC should have the right to reassign spectrum to other operators who are willing to build infrastructure at non commercially viable area. It can be done without jeopardizing the assigned operators already served areas. MCMC have the right to reassign spectrum for specific unserved areas to any operators who are willing to provide service and meet MCMC commitment of providing rural connectivity.

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