

# Inquam

Broadband

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Answers to "Public consultation on the usage of 900, 1800 and 2100 MHz frequency bands by mobile systems"

1.1 Can the proposals for the target assignment and the refarming of the 900 MHz band for mobile systems, be agreed upon, under the 2 described options?

***Basically Inquam Broadband supports AGCOM's short term option for the refarming of 900 MHz spectrum. Due to current developments of advanced technologies new mobile broadband services could be introduced for the benefit of Italian customers. Due to much higher spectral efficiency of these advanced technologies the required network capacity can be supported with a lower spectrum amount per network. Considering this, existing GSM operators should be in position to release some of their existing spectrum holdings for the benefit of new operators without any drawbacks.***

1.2 Are the conditions set forth in the realization of the described assignments deemed adequate?

***Inquam Broadband is in favour with the suggested conditions. However, the roaming obligations based on fair commercial conditions should be only applied to the operators that have a dominant market position.***

***Inquam Broadband supports the proposal of spectrum reduction for the existing operators since the higher spectral efficiency of modern technology would allow covering current and future needs of the existing customers with lower spectrum resources. The resulting free spectrum resources should be reserved for new entrants on the technology neutral basis in order to support innovation and competition.***

1.3 What could be the time frame to realize the new assignment plan, both under the option A and the option B

***Inquam Broadband supports the short term option and suggests to start with the new assignment plan as soon as possible. The required time frame to realize the new assignment plan would probably require one to two years time.***

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***Inquam Broadband would support the option A, since the option B would hinder the benefits of more spectrum efficient technologies, which could be deployed in the 900 MHz band. As explained above those more spectrum efficient technologies would allow the release of some spectrum in the 900 MHz band.***

**2.1 Do you agree on the proposals for the assignment of 1800 MHz frequency band for mobile systems?**

***The 1800 MHz band should remain assigned for mobile services as foreseen in the National Frequency Band Plan. Furthermore, due to the growing demand for mobile services mobility should be allowed also in other bands.***

***However Inquam Broadband supports technology neutral assignments i.e. not limiting to certain technology standards like 3G technology family. This approach supports innovation and competition for the benefit of Italian customers.***

**2.2 Do you deem the conditions foreseen for the execution of the above described assignment to be adequate?**

***Inquam Broadband deems the proposed conditions of the attribution of 1800MHz bands partially adequate.***

***In particular the planned reservation of 2x5 MHz spectrum for a new entrant will support innovation and contribute to competition.***

***However, Inquam Broadband believes that the existing mobile operators have enough spectrum holdings in all mobile bands so that a reservation for the temporary buffering in the refarming period does not seem to be crucial. The remaining spectrum could be assigned to a newcomer instead.***

***In conclusion, Inquam Broadband strongly recommends that the remaining 2x20 MHz should be assigned to new entrants. Furthermore the attribution of the 2x20 MHz should be assigned in a technology neutral way as it is the common practice in all new frequency assignments in Europe. This will stimulate further competition and also support the introduction of new mobile services for the benefit of Italian customers.***

**2.3 In particular which could be the time line for the assignment of the further band available? Which could be the time frame for availability of 3G type of equipment?**

***The technology development cycles are getting faster and faster now. Once mobile spectrum becomes available especially for newcomers and the regulatory environment is encouraging for the introduction of new technologies, new mobile services will be available very soon.***

**However, in order to support the Innovation Inquam Broadband believes that the spectrum usage conditions should not limit operators to a certain technology. Besides already available 3G technologies there are also 4G technologies which are becoming soon available.**

**To sum up, Inquam Broadband believes that the currently available band should be assigned as soon as possible.**

**2.4 How could a refarming plan be organised for the assigned band?**

**The assignment of the remaining spectrum to new entrants would increase competition and stimulate refarming activity by the existing operators. In order to support these developments new entrants should be able to get 2x10 MHz in 1800 MHz band and also released 2x5 MHz in 900 MHz band.**

**For the refarming of the existing GSM assignments in 1800 MHz band, IMT2000 bands as well as 900 MHz bands can be used. Therefore there is no need for keeping additional spectrum for buffering purposes.**

**The existing operators should get a certain period of time (1 – 2 years) for releasing spectrum in 900 MHz band.**

**The refarming procedures should take into account all assigned mobile spectrum holdings of the existing operators.**

**3.1 Do you agree on the technical proposal for the execution of the refarming in 900 MHz and 1800 MHz bands?**

**The technical conditions as proposed by the AGCOM seem to be fair to the exception of the band for buffering purposes in the 1800 MHz band. See also Inquam Broadband's answers above.**

**3.2 Which conditions should be introduced in order for a change in technology by GSM operators to be authorised? In particular, how could consumer protection be assessed?**

**Inquam Broadband has no comments on question 3.2.**

3.3 The EC draft decision under adoption foresees the flexible use of 900 MHz and 1800 MHz bands for Pan-European compatible electronic communications systems, one of which currently is UMTS. Do you intend to propose the introduction of other technologies? How?

***Besides the available 3G technologies also 4G technologies are becoming available soon. Therefore Inquam Broadband supports the technology neutral approach in this reforming procedure. For the introduction of 4G technologies another frequency channelling scheme might be required. Therefore, AGCOM should consider allowing spectrum swaps and trading between operators in order to facilitate these developments.***

4.1 Do you agree on the proposal to assign the ex IPSE2000 2x15 MHz band at 2.1 GHz in blocks of 2x5 MHz, by further reserving two of them in a first instance to a new entrant, for the offer of 3G services, while making the third one also accessible to existing mobile operators?

***Inquam Broadband agrees on the proposal to make 3 blocks of 2x5 MHz accessible to the market. Inquam Broadband further agrees to reserve two blocks for new entrants.***

***As above the assignment of the block should be technology neutral and therefore the 3G technology should not be imposed on the new entrants.***

***However, the juridical situation should be clarified before the ex IPSE2000 blocks are put on the market again.***

4.2 Do you agree on the proposed conditions of assignment?

***Inquam Broadband disagrees with coverage obligations for new entrants since the market conditions have changed since the first assignment of UMTS licences in Italy.***

***The core UMTS bands are widely recognized as a mobile service band and mobile services are already widely accessible nearly throughout the whole country. New coverage obligations won't provide any advantage to Italian customers, but would hinder new entrants significantly. Coverage obligations just force mobile operators to follow a certain business strategy, regardless of their own business model approaches and strategies***

***As for example the UK OFCOM has proposed in its recent consultation on the 2.6 GHz band that new entrants should not be submitted to coverage obligations because of the above reasons.***

***Inquam Broadband strongly recommends not to apply any coverage obligations to i) avoid any market distortions as well as to ii) ensure a fair and competitive environment and for iii) utilizing the full benefits of a technology and service neutral assignment approach.***

***Inquam Broadband disagrees as well on the proposed duration of the assignment since an alignment of the duration would mean for new entrants much less time in order to amortize its investments in a new network than incumbents. As the 2.1 GHz band will be part of the WAPECS framework and thus will be flexible no alignment on the duration of the licences is required. A minimal duration of 20 years should be foreseen for new entrants.***

4.3 If the respondent is a company or other legal entity that could be considered a new entrant in the public mobile services market, it is kindly asked to attach a non-binding letter (max 2 pages) to express its interest in participating in the above described selection, including also indications regarding the project plan and the financial resources foreseen for its implementation.

[ Concess ]

4.4 Do you agree on the proposal for the swapping of the 5 MHz TDD frequency block as described?

***Inquam Broadband agrees with the proposed swap of the 5 MHz TDD in the 2010–2025 MHz bands against 5 MHz in the 1920 MHz band.***

***Inquam Broadband however does not agree on the "freezing" of the 2010–2025 MHz for further purposes. The available spectrum should be offered to the market since there is a significant market demand for mobile spectrum.***

[ Concess ]

Kind Regards

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