

MLL Telecom response to the Broadband Fixed Wireless Access (BFWA) at 28 GHz Consultation Document

MLL's response to the four questions is as follows:

Q.1 Do you agree that the "purpose of use" clause should be removed from existing and future 28 GHz licences?

We agree with the removal of the purpose of use clause.

Q.2 Do you agree that the "use it or lose it" clause should be removed from existing and future 28 GHz licences?

We do not agree with the complete removal of the use it or lose it condition. We are concerned that operators may acquire spectrum purely to hoard it and prevent its useful exploitation by another operator. We would propose that an operator is required to put a minimal level of infrastructure (for example three base stations or a reasonable equivalent number of nodes in a mesh network) into commercial use within five years of licence award.

Q.3 Do you agree that the minimum path length policy should apply where a Licensee provides point-to-point links to other operators?

We do not agree with the application of a minimum path length policy. A licensee is most likely to provide point to point links to other operators either by aggregating multiple links at a base station site for onward transmission or by linking two remote sites by repeating through a base station. In each case, given the maximum practical range of a 28 GHz base station, a minimum path length of 2.5km would render the band unusable in a high proportion of applications.

Q.4 Should the government consider making any other changes to the licences and, if so, for what reasons?

We have no further comments on the licensing process.

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