



July 29, 2020

The Managing Director
Spectrum Management Authority
13-19 Harbour Street
Kingston
Jamaica

Re: Revision of Spectrum Pricing

Having reviewed the proposed **Spectrum Pricing Fee Structures**, please clarify the following:

Section 3.5:

DIRECTORS:

BOK HOA JEONG (CHAIRMAN)
SUZETTE BUCHANAN
MINNA ISRAEL
HON. CHARLES JOHNSTON
SEIJI KAWAMURA
DONG UK KIM
MOHAMED MAJEED
FITZROY VIDAL
COLIN WILLIAMS

- When compared to Bahamas the relief of the islands are in stark contrast to Jamaica and the spectrum benefits that can be realized for users there cannot be equated to spectrum benefits users in Jamaica would gain - given the rugged terrain.
 - What considerations were included in the analysis to account for this disparity in topology, as it does have a direct impact on spectrum utilization?

Section 4: Fixed Service:

- In the calculation of the annual spectrum fee for PtP and PtmP there is consideration for an Inflation Factor. It is recommended that this factor not be included in the fee calculation, as it add variability to the price of the spectrum and affects the ability of companies to forward budget. If it is included in the fee calculations, consideration should be given to a cap for this figure.
- There are no considerations given in the fee calculations to a utility such as JPS, which utilize spectrum solely to support their operations in the delivery of reliable, safe energy – not for commercial gain. Access to affordable, interference free spectrum is needed for JPS to roll out a Smart Grid or it will be very expensive to build, or at worst, impossible.
- There was no mention of 3.5 GHz for PtP links for fixed services. Please clarify if this spectrum will be offered for PtP links in Jamaica?

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Section 4.1.5: Efficiency Factor

- To plan for frequency reuse, access to the Spectrum Utilization Database would be needed to know what frequencies are used in a particular area that may cause interference. Will the SMA provide access to users to this database to aid user's frequency reuse plan, so as to secure the benefits from Category 2.

Sincerely,



Robert Shaw, Manager - Telecommunications