Ooredoo Myanmar Limited
Myanmar Centre Tower 1
192 Kaba Aye Pagoda Rd.
Bahan Township
Yangon
Republic of the Union of Myanmar

11 August 2020

Our Ref: Reg/PTD/2020(490)
Your Ref: 700-PTD/Sub(7)Resources/5752

Posts and Telecommunications Department
Ministry of Transport and Communications
Republic of the Union of Myanmar
Office No (2)
Nay Pyi Taw
Myanmar

Attention: Director General

Dear Director General,

Subject: Comments on Microwave Frequency on Link by Link Basis

This letter serves as a response to the above referenced letter in which PTD requested OML to provide comments on the planned migration of microwave frequency allocation on link by link basis by end of 2020.

OML appreciates the opportunity to comment on the planned migration. However, we respectfully request PTD to note that all Operators will be challenged in terms of the technical complexity involved in making the proposed migration of microwave frequency to usage on a link by link basis.

In addition to being technically complex the proposed link by link approach is extremely inefficient in terms of the operational needs of the Operators and quite likely customer experience. There is no legitimate benefit to PTD in taking such an approach. As we consistently pointed out since at least 2015, an ordered block assignment basis microwave allocation is far preferable and industry best practice.

It is important to note that microwave hardware is based on specific band and sub-band assignment and ordering equipment for new links would be dependent on approvals for frequency assignments. Therefore, the processing time for new link deployment will necessarily be prolonged if the industry were to proceed with microwave frequency assignments on a link by link basis.

With the current approach to microwave frequency assignments, in the event that an Operator is required to upgrade the existing congested microwave links to improve customer experience, the Operator can maintain the appropriate stock for microwave hardware in accordance with the block assignment. Channel spacing upgrade can then be done seamlessly. However, with the proposed link by link assignment, it would be difficult to maintain hardware stocks, which would have to be ordered on each occasion in accordance with assigned links. Therefore, channel spacing upgrade cannot be done seamlessly.

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In addition, in the circumstances where an Operator is required to undertake the urgent relocation or reengineering of several microwave clusters to address unforeseen issues or emergencies such as natural disasters or emergency situation, it will be difficult to address the issues in a timely manner with proposed link by link assignments.

Although link-by-link assignments are likely to reduce the probability of inter-network interference, on the occasions when such interference occurs, given the lack of pattern and predictability of the link-by-link assignments of microwave frequencies, the total timeframe to detect and rectify the interference would be significantly longer than with block assignments. This would be detrimental to Operators' quality of service and customer experience.

Given the above, it is clear that the proposed link-by-link approach to microwave frequency assignments is technically unfeasible and inefficient for the industry. Were it to be implemented, we believe that the little benefit which PTD believes can be gained by this approach would not outweigh the challenges to be faced by the industry. Under the circumstances, therefore, we respectfully request PTD to reconsider its proposal in this regard.

Thank you for the opportunity to comment and we are also as always, willing to make ourselves available to discuss this matter further, should PTD consider it appropriate to do so.

Yours truly,

Chris Peirce
Chief Legal and Regulatory Officer