



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

19 May 2021

Our Ref: Reg/PTD/2021(237)
Your Ref: Meeting dated May 12th 2021

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: Additional Comments on Spectrum Roadmap

Following the meeting with PTD dated May 12th, 2021, this letter serves to provide additional comments by OML on the Spectrum Roadmap 2020.

As indicated in the meeting, we respectfully submit that given the current circumstances, the assignment of the available IMT spectrum bands should be deferred by a year at earliest with the same sequence for the release of the bands as previously proposed by OML.

We strongly recommend that, especially given current market conditions, the assignment of valuable spectrum should be balanced with a real demand for services in Myanmar in order to ensure that the efficient investment of capital in networks will offer immediate benefit to the people of Myanmar.

Given the current socio-political realities in Myanmar, including the outbreak of the COVID-19 pandemic, the resources of Operators are dedicated to ensuring the continuity of our operations and that our customers are properly served at this challenging time. Under the circumstances, the whole industry would be challenged to balance the costs, revenues and necessary capital investments that a new assignment of prime spectrum would demand in 2021. We respectfully submit that any allocation of the spectrum this year would not yield the enthusiastic participation of Operators and therefore, would not attract the return that the Government should rightly expect from this.



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For the reasons set out above, we respectfully submit that the proposed allocation of the spectrum bands should be deferred by at least one year. Attached with this letter, please find the diagram which shows OML proposed release schedule for available IMT bands.

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,

A handwritten signature in black ink, appearing to be 'Chris Peirce', written over a light grey rectangular background.

Chris Peirce
Chief Legal and Regulatory Officer