

**MPT RESPONSE  
TO  
MINISTRY OF TRANSPORT AND COMMUNICATIONS POSTS AND  
TELECOMMUNICATIONS DEPARTMENT – DRAFT SPECTRUM  
ROADMAP 2020 FOLLOW UP MEETING**

### Introduction

MPT is grateful for the opportunity to provide further comments to the PTD following the industry stakeholder meeting held on Wednesday 12<sup>th</sup> May 2021.

### Releasing more 2600MHz spectrum on a regional basis

As stated in our initial response to the draft 2020 Spectrum Roadmap last December, the 2600MHz band is vitally important for 5G mid-band planning in Myanmar due to the limited amount of available 3.5GHz spectrum. MPT therefore strongly urges the PTD not to release any more 2600MHz spectrum for regional BWA use and instead retain it for future nationwide allocation as part of a multi-band release for 5G use. This approach is consistent with the industry's approach to the 2600MHz band ever since the regional spectrum allocations were being planned in 2015/6.

One of the BWA operators made the claim during the meeting that they require additional spectrum to meet their quality of service (QoS) targets. MPT would like to point out that adding sites and capacity is needed to address QoS metrics rather than extra valuable spectrum. We estimate that the BWA has much less number of sites as the MNOs do in the same city coverage areas and this indicates a need for more investment in sites is needed. The PTD might request a detailed analysis of the QoS to understand whether the existing regional spectrum has been used effectively as well as a measurement report from customers device showing the signal quality vs user experience, which will tell whether the BWAs have enough sites to cover the target coverage area(s). Finally, the BWAs should evaluate other solutions to increase spectrum efficiency such as Massive MIMO, splitting cells and higher power radio before asking for additional spectrum, i.e. more spectrum should be the last resort and not the first.

If a BWA operator can justify the need for additional spectrum in Regions 2 or 3 then the PTD might release the 20MHz block that YTP was unable to secure in 2016 due to non-payment of auction fees.

### Converting regional licences into national licences

During the meeting the PTD asked for views and suggestions for converting regional 2600MHz licences into national licences. MPT strongly believes this should not occur and there continue to be a clear distinction between the four NTL licences and smaller regional BWA operators in Myanmar. Therefore, as laid out in the 2016 auction documentation, each BWA operator should be limited to operating in any two of the three Regions.

### **C-Band guard band in 3.5GHz band**

Globally, the 3.5GHz band is the most popular mid-band spectrum band for 5G use. However, in Myanmar the amount of spectrum that can be released for 5G use is limited because much of the band is already allocated to C-Band satellite services. The draft 2020 Spectrum Roadmap assumes a 105MHz guard band between the two services which then limits the initial amount of spectrum that can be assigned for 5G use to 120MHz. Windsor Place Consulting (WPC) commented at the meeting that the guard band could be reduced and the PTD could increase the spectrum for 5G use to 180MHz. MPT requests the PTD to urgently investigate this matter further and aim to modify the Spectrum Roadmap so that 180MHz can be released for 5G use.

### **Spectrum auction vs administrative release**

Whilst the PTD made comment during the meeting that a spectrum auction similar to that undertaken by Thailand last year is attractive, MPT still firmly believes that an administrative assignment of IMT spectrum is the best option overall for Myanmar. This view is reinforced by the economic impacts being seen this year from the joint issues of the pandemic and the state of emergency. MPT therefore urges the PTD not to dismiss the idea of an administrative / beauty contest methodology in future.

Should the PTD decide to implement a spectrum auction(s) in future, MPT agrees with the comment made by WPC that a multi-band release event would be advantageous because it will likely lead to a better outcome for operators and the industry as larger contiguous blocks of spectrum can be made available and this is needed for 5G.

### **License exempt spectrum**

At least one NFS(I) licensee is advocating more spectrum be assigned for licence exempt use in Myanmar in the 5GHz and 6GHz bands. As MPT commented in our written response in December, the PTD is requested to investigate the unfair commercial use of the license exempt band by some ISPs before any consideration is given to assigning any additional spectrum. The Spectrum Rules state that this spectrum can be used for ISM purposes which does not align with actual experience in the market today.

In addition, one ISP is building its own Wi-Fi devices to deliver its commercial service using the license exempt bands; MPT is concerned that these devices are not being type approved by the PTD or checked that they meet the relevant standards, including proper channel use.

### **Spectrum release timing**

During the meeting the mobile operators and some of the NFS(I) licensees made the point that spectrum release plans should be delayed due to current economic conditions – participants talked of delays from 1 to 2 years. Whilst MPT does not have a specific date in mind, we estimate needing additional spectrum 2 years after operations are normalised following the state of emergency. MPT would therefore urge the PTD to be flexible in the amount of time to wait before starting any of the major IMT spectrum releases envisaged in the 2020 Spectrum Roadmap.