



Ooredoo Myanmar Limited
MICT Park Building No. 10 Block 2
Myanmar Info Tech
Hlaing Township
Yangon
Republic of the Union of Myanmar

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Our Ref: Reg/PTD/2015(21)

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

spectrumresource.ptd@gmail.com

Attention: Director General

Dear Director General,

2600 MHz Auction

This letter is with reference to PTD's February 3, 2016 *Consultation with Stakeholders Regarding Potential Parameters for the 2600MHz Auction and Expression of Interest in Participation* (Consultation). Ooredoo Myanmar Limited (OML) is very concerned about the proposed frequency auction as detailed in the Consultation, which appears to be structured in a manner that is inconsistent with international best practices and is being arranged in an unjustifiably hasty manner.

Please find attached to this letter OML's prior communications to PTD and the Myanmar Investment Commission with regard to this Issue as detailed in an earlier draft consultation. While OML is encouraged that PTD decided to alter the initial proposed auction framework, in which OML and other existing mobile operators were to be excluded, the other major issues discussed in these letters remain significant concerns. These include:

- The proposal to issue up to 7 additional nationwide mobile wireless licenses, which is wholly inconsistent with the Union Government's prior commitment to OML that there would be no more than four nationwide mobile licenses.
- Moving forward with this auction before the spectrum roadmap and an associated plan for the future licensing of radio spectrum has been completed, which is inconsistent with international practice and without sound rationale.
- Prioritizing the auction and licensing of the 2600 MHz band generally, which is inconsistent with international best practice to place a higher priority on licensing more useful and available bands with more commonly available compatible



devices and better radio propagation characteristics, such as the 1800 MHz or 700 MHz bands.

In addition, OML notes that limiting the available spectrum for each bidder to one licence of no more than 2 x 10 MHz FDD or 20 MHz TDD is an inappropriate cap and an inefficient allocation of frequencies that are likely to be used for LTE. A more useful approach that would maximise value and enable higher speed downloads at greater capacities would be to remove the cap and allow a combination of the proposed channels into 2 x 20 MHz or more FDD and larger TDD blocks.

For these reasons and in order to maintain PTD's strong record of furthering successful policies that enhance the ICT environment and benefit the citizens of Myanmar, OML urges PTD to postpone the proposed 2600 MHz auction until it is able to develop a holistic and coordinated spectrum licensing plan designed in accordance with international best practice principles.

If, despite the concerns articulated above, PTD is determined to proceed with the 2600 MHz auction as proposed, OML hereby expresses its interest in participating in order to preserve its competitive position in the Myanmar marketplace.

Sincerely,


Rene Meza,
Chief Executive Officer

