



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

April 9th, 2020

Our Ref: Reg/PTD/2020(308)

Your Ref: 700-PTD/Sub(7)Resources/2497(a)

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: Response on Allocation of 700MHz Spectrum

This letter serves as a response to the above referenced letter in which PTD requested OML to provide comments on the planned allocation of 700MHz spectrum within the year 2020.

For the reasons set out below, we believe that the assignment of 700MHz spectrum should be deferred until 2021 at earliest.

With the recent outbreak of the COVID-19 pandemic, Operators' resources are dedicated to ensuring the continuity of our operations and that our customers are properly served at this challenging time. Given the uncertainty as to the length of time that the situation will persist, we believe that, for the rest of the year 2020, the whole industry will be challenged in terms of costs, revenues and prioritization of necessary capital investments. Therefore, we respectfully submit that any allocation of spectrum at this time would not yield the enthusiastic participation of Operators, would not attract the return that the Government should rightly expect from such an event and, most importantly, would not lead to the immediate additional investment and productivity enhancements that should follow any efficient allocation.

Any assignment of spectrum at this time would only be disruptive and would divert attention from our collective efforts to support the entire nation through a historically challenging time.

Thank you for the opportunity to comment and we also 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