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To Director General

Posts and Telecommunications Department

Ministry of Communications and Information Technology

From Global Technology Co.,Ltd.

Date 17.February.2016

Reference No. GN(Y)-Sales/PTD (Comments)/2016-0033

Subject Comments for Framework for the 2600MHz Spectrum Auction

Dear Sir,

We, Global Technology established in 2002, is a leading telecommunication service provider in Myanmar providing telecommunications, data communications and networking systems to the commercial, government and defense sectors. We also distribute a broad range of world-class telecommunications, data communications and networking products including Satellite communications, Microwave, WiMax, Wi-Fi, IP Networking, Security, VoIP, Video Conferencing and others. We also provide Global Internet Access, IPLC and MPLS IP-VPN services for multinational corporations to get connectivity to every corner of the world. We have been awarded NFS (I) License on 30 November 2015.

This is in response to your publication for the framework of 2600 MHz Spectrum Auction with attached documents upon your uploaded the Framework for the 2600MHz Spectrum Auction for New Broadband Data Services on Ministry of Communications and Information Technology website. We would like to send our comments upon this framework as per attached documents.

Best Regards,

Managing Director (For)

Thein Kyaw Min (Director)

Comments for Framework for the 2600MHz Spectrum Auction for New Broadband Data Services

According to your proposed framework for the 2600MHz spectrum auction for New Broadband Data Services, we would like to express our comments as below

As for your proposed structure of the 2600MHz Band for the 2600MHz Auction,

- ➤ We wish you to designate all TDD in 2600 MHz band rather than mix FDD & TDD to more efficient usage of spectrum in 2600MHz band.
- ➤ It will be much competition in the market and there will be very little chance for long term survival for broadband operators as per you proposed allowing up to 7 licenses in 2600MHz band. If there will be 3 or 4 broadband operators in the market, it is the optimum number of the operators like Mobile Network Operators. So we would like to suggest to award 3 broadband wireless license for best competition in the market as well as for users.
- ➤ By awarding only 3 or 4 broadband operator licenses, you can allow to allocate more spectrum bandwidth to them such as 30 MHz, 40 MHz, 50 MHz each.
- ➤ If you will allow to Mobile Network Operators to compete in the auction process of 2600MHz, there will not fair for broadband operators because there is only a chance to compete in the spectrum auction process for broadband operators. As for Mobile Network Operators, they were already allocated in 900MHz and 2100MHz. Moreover Mobile Network Operators will have a chance to compete in 1800MHz auction process when they will get allow to operate LTE.

As for the Payment of the Auction Fee,

The local operators will have very inconvenience cause of your proposed aggressive payment term within 240 days. We would like to request you to reconsider for the payment term as within 3 (or) 4 years to be convenience for broadband operators.

As for the Roll out Requirements,

➤ We feel your proposed required population coverage commitment make burden to broadband operators. As the potential broadband operators are small independent license holders and they are not global operators, they could not make strong commitments for your proposed population coverage like Mobile Network Operators. Therefore we would like to propose for population coverage commitment up to 50% of total population in Myanmar within 5 years.