



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

23 December 2021

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Your Ref: 700-PTD/Sub(7)Resource/6242(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: OML Comments on Spectrum Roadmap (Final Draft)**

This letter serves as a response to the above referenced letter in which PTD requested OML to provide comments on the final draft version of the Spectrum Roadmap 2021.

OML's comments on the final draft Spectrum Roadmap are set out in detail as below.

**General Comments:**

As we have previously submitted to PTD, the assignment of this valuable spectrum should be done in a timely fashion to as to respond to a real demand for services in order to ensure that the efficient investment of capital in networks will offer immediate benefit to the people of Myanmar. Therefore, we respectfully submit that considering the demand and the current realities in Myanmar, the assignment of these available IMT spectrum bands should not be released within 2022. In addition, we respectfully submit that any allocation of the spectrum next year would not yield the enthusiastic participation of Operators and therefore, would not attract the return that the Government should rightly expect.

**Proposed Release Schedule of the IMT Spectrum Bands:**

Under the circumstances, OML would like to recommend the release schedule of the valuable IMT spectrum bands as follows:

- To release the capacity spectrum such as 2.3GHz, 2.6GHz and 3.5GHz altogether not before early 2024. We recommend a nationwide allocation in 2.6GHz.



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- To release the coverage spectrum such as 700MHz a year after the release of capacity spectrum such as 2.3GHz, 2.6GHz and 3.5GHz.
- To release the mmWave spectrum in 2025 or later based on demand.

With this approach, we believe that we can collectively bring immediate benefit for Myanmar consumers for higher 4G penetration while allowing for more maturity of any 5G ecosystem in Myanmar.

#### Other Comments:

In addition to the above, we note that PTD is planning to reserve 2x10MHz in 700MHz for government use. However, we wish to recommend that a minimum of 4 blocks of 2\*10MHz should be available for allocation to MNOs. To do otherwise will significantly hamper the rollout of any 5G services in Myanmar.

PTD also indicated in the final draft paper that the additional spectrum of C-band will be released depending on the level of demand. However, since the remaining spectrum bands in the C-band are currently allocated for satellite services, we would like to request PTD to specify how the allocation will be made for that extra C-band spectrum.

As it relates to the license-exempt usage in the 5GHz band, OML supports PTD's approach in expanding the license-exempt usage in this band. We also encourage PTD to open the full range within the 5GHz band to have more flexibility to provide short range broadband services at a committed quality level.

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,

**Chris Peirce**  
Chief Legal and Regulatory Officer