



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

1 April 2022

Our Ref: Reg/PTD/2021(193)

Your Ref: 700-PTD/Sub(7)Resources/0935

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 Response for EGSM Re-planning

This letter serves as a response to the above referenced letter in which PTD informed OML of its intention to not allow the renewal of OML's current EGSM holdings (2 x 2.2 MHz) (UL: 885.6 – 887.8 MHz/ DL: 930.6 – 932.8 MHz) ("OML's EGSM Spectrum"), which will expire in 2023, due to the re-planning of 850/EGSM 900 MHz spectrum as per the draft Spectrum Roadmap. PTD also requested OML to submit the timeline required for the migration of those users that are currently being serviced using OML's EGSM Spectrum.

At present, OML continues to provide 2G services to our customers using OML's EGSM Spectrum. Our records for the last 30 days show that 25% of the voice users in our network are still supported by 2G services. This continued reliance on 2G technology is necessary to support the provision of voice services to this segment of users. Especially in rural and sub-urban areas of Myanmar handset use that continues to rely upon 2G services is and will for the foreseeable future be a reality. Given current market economics, to deprive these subscribers of access to 2G would pose a significant hardship. Therefore, given the continued reliance on OML's EGSM Spectrum to provide voice services to a significant portion of our subscriber base, any plan for migration from the OML's EGSM Spectrum that we can reasonably undertake at this time must ensure that these subscribers are not impacted by significant service disruptions.

In accordance with the RAN planning procedure, OML's migration from OML's EGSM Spectrum can be initiated only after PTD completes the new segmentation and re-planning of spectrum on the 850/900 MHz bands. It is only after we are advised as to our long-term holdings in the 850/900 MHz bands that we can properly determine the extent of the migration necessary. For example, if our long-term holdings include the temporary assignment that we currently use, the efforts required for migration, as it relates to both time and cost required, would be significantly less than if it were necessary for us to migrate to completely different spectrum assignments.



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Under the circumstances, therefore, we respectfully request PTD to extend our current use of OML's EGSM Spectrum until the 850/900 MHz band plan has been finalized. This would allow OML to continue to provide services to its customers while undertaking a planned switchover to specific long-term holdings on a phased basis so as to minimize service disruptions. This would allow us to proportionately surrender our current holdings as we incrementally switchover to the new assignments.

As PTD prepares to finalize the plans for the 850 MHz/900 MHz bands, we strongly recommend that contiguous assignments of spectrum be undertaken. The current EGSM/ 900 MHz band allocation is not contiguous for OML nor for the other Operators who have been allocated the EGSM/900 MHz band (TML and Mytel). Consequently, in order to avoid interference, the Operators have implemented guard bands in between their respective assignments. If the spectrum assignments were sequential, more bandwidth could be utilized to serve more customers rather than to implement guard bands. This would be a better use of spectrum as a scarce resource.

In addition, we believe that long-term assignments should be consistent with existing temporary holdings so as to minimize the volume of investment required to modify the Antenna System and the Radio and Base Station System to accommodate completely new spectrum assignments.

For the reasons set out above, we can only give a more precise assessment of the efforts required to migrate from OML's EGSM Spectrum when we have specific indicators as to our long-term holdings in the 850/900 MHz bands. Once this information is forthcoming, we can then present PTD with a definite plan as to the process and timelines required to complete the migration. If long-term spectrum assignments are contiguous and consistent with existing holdings, migration would be less disruptive and can be undertaken over a relatively short period of time.

We believe that this is the same perspective shared with other Operators who have been allocated the EGSM/900 MHz band. In addition, the sequential approach suggested herein is in the interests of Operators and PTD as well as the people of Myanmar.

Thank you for your consideration for the foregoing 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,

A handwritten signature in black ink, appearing to be 'Chris Peirce', written over a horizontal line.

Chris Peirce
Chief Legal and Regulatory Officer