Dear Nicta,

With reference to the public consultation notice published, Huawei Technologies， as a vendor would like to submit our comments and submission for your consideration.

2.6G B41 spectrum allocation is highly recommended in PNG network rollout instead of 2.6G B7+B38, after comprehensive analysis and consideration in terms of spectrum utilization efficiency, ecosystem maturity and future technology evolution.

Below are the key advantages of 2.6G B41, and please refer to the attachment for details.

1. Advantages of the 2.6G B41 in 4G Network Rollout:

- Mature industry chain: The world's largest (China Mobile) and most complex (SoftBank Japan) networks are available, and all chips and terminals are supported.
- Higher utilization of spectrum resources than B7 2600 (No guard band is required, which makes it easier to use Massive MIMO tech to improve coverage and capacity.)
- Low network construction cost and fast network construction (Compared with B7+B38, no customized filter is required. One TDD module is required.)
- The capacity is several times that of the B7 and the coverage is 6 dB higher than that of the B7. The F+T network is the most efficient with the existing FDD network to meet asymmetric service requirements.

2. Importance of 2.6G B41 in evolution to 5G:

- All spectrums will evolve to 5G and coexist for a long time. The 5G chip industry chain also supports sub-3G.
- 2.6 B41 has advantages over B7 (High capacity, continuous 100 MHz, spectral efficiency, UCN, etc.)
- 2.6G TDD is on the road to 5G evolution (for example, China Mobile and SoftBank).

We are happy to meeting with NICTA for more information sharing.

Regards,
Sean Ng