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## **PUBLIC CONSULTATION**

**Response to**

**Call for Comments by NICTA:**

**➤ 800 MHz BAND PLAN**

**➤ 2.6 GHz BAND PLAN**

**➤ 5G SPECTRUM BANDS**

**April 12<sup>th</sup> 2021**

## **1 INTRODUCTION**

Kumul Communications Limited (KCL) would like to thank NICTA for organizing this Public Consultation and Call for Comments on the proposed use of 800 MHz Band and 2.6 GHz Band for mobile services and Identification of 5G spectrum in Papua New Guinea.

KCL is a prospective mobile operator that has not commenced commercial operations yet, and therefore does not have operational experience, and only offers comments from the prospective views of a new entrant.

PNG is a congested market place with several operators having taken most of the spectrum available leaving little or insufficient space for new entrants. It is therefore very difficult for a new entrant to cost effectively compete in coverage. A new entrant with much less spectrum is required to rollout few times more towers to achieve the same population coverage as an operator with more spectrum. This reflects in much greater infrastructure cost and difficulty in attracting partners or secure finance as the business model is seen as not viable. This is a serious barrier to entry for competition.

KCL welcomes the replanning of the 800 MHz Band and 2.6 GHz Band and hopes that the release of new mobile spectrum would alleviate the situation.

## **2 800 MHZ AND 2.6 GHZ BAND PLANS**

The principle of PNG aligning its spectrum use with global and regional use is strongly supported by KCL. This is the only way PNG can use affordable off the shelf base stations and end user equipment.

By adopting harmonized band plans PNG operators and subscribers will also be able to participate in roaming arrangements with the rest of the world, especially from the neighbouring countries.

KCL support frequency plans that are spectrum efficient and with the minimum potential for harmful interference. In this regard KCL believes that the 800 MHz Band is incompatible with the adjacent 900 MHz band and NICTA may need to look at alternatives to mitigate this potential.

KCL also believes that the provision of PPDR in PNG needs to be carefully considered. How will PPDR be provided and who will fund the infrastructure are some of the questions that need to be answered in consultation with government. It would appear economically cost prohibitive to invest in an independent infrastructure for this purpose. It would seem that partnership with mobile operators is a more viable option.

The proposal for the 2.6 GHz band needs to also be considered in light of international experience. There are opposing views regarding the use of TDD and FDD or a combination of the two. PNG needs to not rush and would benefit from further research and discussions to determine the best solution.

### **3 SPECTRUM LICENSING PRINCIPLES**

KCL support spectrum efficiency. Spectrum is a scarce resource and must be used in the best way for its stakeholders, or the people of PNG. KCL also believes that new entrants need to be provided sufficient spectrum resources compared to existing operators to be able to rollout viable networks.

The allocation of new and additional spectrum resources to operators who have substantial holdings is not supported.

Furthermore, KCL is of the view that the spectrum holdings of operators that have not used it efficiently for many years needs to be reviewed and some of their spectrum be reclaimed by NICTA for further redistributions to new entrants or operators who clearly demonstrate the need for it and the ability and commitment to use it. In particular, the combined spectrum holdings of SOEs needs to be re assessed and consolidated to tailor it to their requirements.

#### **4 5G SPECTRUM IDENTIFICATION**

KCL believes that all frequencies identified for 5G by WRC 2019 and prior should be possible for use in PNG. This includes all spectrum which is currently used for lower generations of mobile services.