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Ministry of Business, Innovation and Employment
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<By email>

Dear Len

Fixed Services in New Zealand Discussion Document

Thank you for the opportunity to comment on the *Fixed Services in New Zealand Discussion Document: Ensuring efficiency in the backbone of the digital economy, January 2015*.

Vodafone would like to comment on the following sections and questions in the document.

Paragraph 3.10. R band.

Question 32. Should the Ministry adopt 28 MHz channelling for the R band?

Vodafone Comment: Yes, as this will improve the available channels in the band i.e. 7, 14, 28, 56 MHz and will maximize the higher data-rate of equipment available in the market today.

Question 33. If the Ministry is to adopt 28 MHz channelling, should this be applied to new licences only or should all existing licences be required to transition to the new channelling? How long a timeframe should be allowed for the transition?

Vodafone comment: If the Ministry is to adopt 28MHz channelling this should be applied to new licences only. Vodafone has a substantial number of existing licences in the R band. Re-licencing of the current licences will introduce significant cost to the licensee. The Ministry needs to consider maintaining both the current and proposed channelling plans over the longer term.

Paragraph 3.13 U, W and Y Bands

Question 40. Should W band be rechanneled to enable either 28MHz, 40MHz, or 56MHz channelling to enable new services? Which channel size is preferred? Why?

Vodafone comment: W band should be re-channelled to enable new services. The 28MHz and 56MHz are preferred options as most of the equipment manufacturers (vendors) offer 28 and 56 MHz channelling. Vodafone has a substantial number of existing licences in the W band. Re-licencing of the current licences will introduce significant cost to the licensee. The Ministry needs to consider maintaining both the current and proposed channelling plans over the longer term.

Paragraph 3.15 Z Band

Question 46. Should the Z band channel plan be changed to 28 MHz channels? If not, why not?

Vodafone comment: Yes, the Z band channel plan needs to be changed to 28MHz. This would make available a wider number of equipment options. It would also allow 56MHz channelling to be available for use by interleaving 2x 28 MHz channels.

Question 47. If a 28 MHz channel is adopted, should the Ministry also adopt a 56 MHz channel plan?

Vodafone comment: Yes, the Ministry should also adopt a 56 MHz channel plan. This will offer a higher data rate and maximize the equipment's 56MHz channel features available in the market today.

Question 48. If the band is rechanneled, should incumbent licensees be required to transition to the new band plan?

Vodafone comment: No, the incumbent licensees should not be required to transition to the new band plan. Vodafone has substantial number of existing of licences in the Z band. Re-licencing of the current licences will introduce significant cost to the licensee. The Ministry needs to consider maintaining both the current and proposed channelling plans over the longer term.

Paragraph 3.17. X band

Question 50. Should the Ministry introduce an additional 56 MHz channel to the X band, or should it remain unavailable for assignment?

Vodafone comment: Yes, the Ministry should introduce an additional 56MHz channel. This will provide more capacity in the band and give additional channel for licensee wanting a higher data rate in this band.

Paragraph 3.18. 18 and 23 GHz bands

Question 52. Should the Ministry remove the underutilised 3.5 and 7 MHz channels from the 23 GHz channel plan?

Vodafone comment: Yes, the Ministry should consider the removal of the underutilised 3.5 and 7 MHz channel in the 23GHz channel plan. Due to the growing demand of wireless throughput bandwidth (point-to-point microwave), most of the licensees like Vodafone don't use these 3.5 and 7 MHz channels anymore. These channels are currently underutilized as reflected in the discussion document by the RSM.

Should you have any questions, please do not hesitate to contact me at eric.liu@vodafone.com.

Yours sincerely

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