Discussion Paper Response

RSM 24 – 30 GHz use in New Zealand Discussion Document - DANZ response

DPR001 version 1.0

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Revision History

Version	Changes	Date	By
V0.1	Initial Draft	30/5/2021	
V1.0	Final	05/05/2021	

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1 Introduction

Dense Air NZ welcomes the opportunity to participate in the discussion and shares its position on some of your questions.

Dense Air recently purchased 200 MHz at 26 GHz in Australia and desires that there is technical alignment of the NZ offering to ACMA.

2 Specific Question responses

Q1. What are the most likely use cases in New Zealand for mmWave based 5G services?
Dense Air plans to use mmWave to support a wide range of requirements from FWA through to low latency device communication using small cell deployments. The challenge of 10–20-year foresight, end user demand and device availability will influence the specific roadmap for all users of this spectrum; hence NZ must prepare to allow a wide range of uses.

Q6. Do you agree New Zealand should allocate 24.25 - 27.5 GHz primarily for IMT use?
Yes

Q7. How should RSM accommodate other use in this band such as space services?
Case by case

Q8. How do you see our proposal of the 28 GHz band allocation?
Dense Air is supportive of either option as both seem flexible enough to allow potential uses and may be influenced by licensing options. Definition of Primary and secondary services is appropriate.

Q14. What's your preferred licensing option in 26/28 GHz spectrum?
Nationwide MR for 26 GHz IMT and a combination of regional and radio licence for 28 GHz IMT services. Non IMT services can be licenced or GURL as appropriate and nationwide.

Q17. Do you agree RSM should adopt 3GPP NR FR2 based channel bandwidth to design a channel plan in the radio licence regime for IMT services?
Yes

Q18. Do you agree RSM should refer 3GPP standards to set the regulatory requirements for spectrum allocated to IMT?
Yes

Q19. Should we introduce a break point for MR technical conditions mid-way through the duration of the MR? Or is it sufficient to set AFELs based on current technology and standards only?
Review/consultation during the life of MR is appropriate. It is important reasonableness is retained in any changes.

Q20. Do you agree RSM should mandate equivalent ETSI harmonised standards for radio licences in Radio Standards Notices and review these standards regularly?

Yes, as per Q19.

Q28-30 Synchronization
It is critical that all spectrum can be used efficiently and is fit for purpose. Once there is some clarity on how RSM proposes to offer both bands it is then prudent to discuss and agree the best synchronisation strateg(ies)

3 Conclusion

Dense Air is a global provider of small cell RAN as a Service, offered on a neutral host basis. We believe that mmWave is critical to supporting high bandwidth services, complementing the lower IMT Bands and allowing NZ to leverage the benefits.

We look forward in participating in future discussion.

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