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12 July 2021,

To whom it may concern,

**Re: MSP review**

**Question 1: Do you think that co-operation is feasible in the Managed Spectrum Park?**

Yes. WISPA members have proved that many times in the way that they have worked together. As most of wisps members within rural areas and no align easily to regional territorial authorities (TLA) boundaries, nor does a radio equipment.

The rules around allocation and use of Spectrum with the park need to talk into account multiple factors which include the flexibility to change frequencies and hardware vendor as technology changes and technology vendors make product lines obsolete.

**Question 2: When considering MSP spectrum allocations, what allocation method(s) would be preferable to you?**

We prefer an interpretant party to administrative application. This ensures that the government's policies and or political agender not influence choice and no one business over another business. For example, enhancing rural coverage, can influence the choice. Furthermore, the availability of spectrum for smaller business vs big business should be equal and fairly distributed.

**Question 3: What are your thoughts on the level of technical requirements/rules in relation to MSP licenses?**

The existing regional boundaries based on historic TLAs is not ideal, as radio doesn't understand these arbitral boundaries. It would be better to look at regions that are more suitable to RF use where terrain creates a boundary between regions. There needs to be a balance struck between strict technical requirements that limit flexibility and innovation and more loose requirements that would make it more difficult to define clear boundaries between license holders.

**Question 4: What are your thoughts on the best method(s) for future regional/non-national spectrum allocations?**

The vast majority of existing 2.6GHz usage is for fixed wireless access in rural areas. The current method of costing based on population causes a problem where users have to pay more where their coverage includes dense urban areas that are well served by fibre and MNO's with much more spectrum available so are not likely to use the fixed wireless services.

As above with Q3, geographical boundaries should be realigned to suit terrain and population areas more readily. Spectrum needs to be used so robust implementation rules need to be put in place to ensure that it is used within a reasonable time-period.

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**Question 5: Should priority be given to incumbents over new entrants?**

This isn't an easy answer to this question, thus Yes and no

Yes: priority should be given to existing rights holder (incumbents) over new entrants providing that the incumbents have a proven track record of utilising the spectrum well in their region allocated regions.

No: However, as per question two these should not favour one business over another business.

**Question 6: Is the market big enough to support sub-regional competition?**

Sub-regional competition is already happening independent of spectrum allocation. There is no need to break the allocations down into sub-regions.

**Question 7: Should spectrum allocation rules be used to limit consolidation (mergers or take-overs) of regional players?**

There should be rules limiting the number of regions that one entity can have, and this will address consolidation issues. Current rules appear to be adequate in this regard.

**Question 8: What are your thoughts on how to protect regional rights for regional use?**

To order protect regional rights effective rules, need to be in place to ensure that national providers who already have other national spectrum rights should not be allocated regional rights.

Robust implementation rules and monitoring needs to be done. The RSM should support existing rights holders that have complied with the rules and be the final arbiter when it comes to an impasse between applicants/rights holders.

The Park rules need to make this more feasible in regard to compatibility of technologies and bandwidth allocation. Some technologies have a smaller bandwidth requirement. LTE for fixed Internet usage, for example, requires 40MHz to provide the performance required by most users.

On the other hand, as technologies changes, the equipment which is manufactured in the USA need to compile with the FCC requirements and have RF Hardware limitation built in and as such don't fit the existing allocated spectrum but are still valid spectrum with the MSP, there need to some thought in to how the MSP can support the changing technologies and existing right holder can their existing right holder new technologies and withdrawn technologies.

Kind regards,

Jason Orchard  
Chief Technology Officer