



Allocation of 24 - 30 GHz Spectrum: Technical Discussion Document

Submission | RSM

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Executive Summary

Thank you for the opportunity to provide feedback on the Ministry's mmWave technical consultation paper.

The consultation paper primarily sets out the use cases and potential technical matters for shared IMT and satellite use of the 24-30GHz range. We support the Ministry's description of current use cases and reference to international technical standards and developments in defining the bands.

IMT access to mmWave spectrum

The Ministry proposes to defer considering the IMT assignment processes for both the 26 GHz and lower 28 GHz bands until between 2028 – 2030, making spectrum available to mobile, fixed wireless and private network providers sometime after 2030.

We don't support the proposed approach as it risks unnecessarily holding up the deployment of key 5G infrastructure and private network deployments. There is widespread support for IMT in the bands:

- While the economics of wide area mmWave deployments are currently uncertain, there are already commercial FWA, stadium and private network deployments in the key markets we align with¹.
- There is further international support for the bands with authorities having largely identified and harmonized the bands, allocating up to 1000 MHz of spectrum to mobile operators. mmWave spectrum has been allocated to providers in the major economies we align with such as USA, Australia and the UK².

The level of IMT support for band means we can be confident that additional use cases and technologies will emerge over time, and the key uncertainty is not if, but when wide area mmWave deployments occur.

A phased approach to band planning and allocation

While we appreciate that the Ministry is juggling competing priorities for its technical resources, a phased approach would provide early certainty to IMT operators and mitigate the risk that spectrum allocation holds up critical infrastructure deployment. For example, the Ministry should:

- Make geographic licences in the lower 28 GHz band available for FWA and private network deployments as soon as possible. We are already seeing deployments overseas.

Licences should be available to any FWA/private network operator at the same time as any satellite licences are issued in the band. Differentiation based on whether a provider is a

¹ For example, [5G mmWave Deployment Best Practices Whitepaper - Networks](#) and [Millimetre-Wave Spectrum July 2025 | GSA](#)

² ACMA allocated the mmWave band to mobile operators in 2021 (up to 1 GHz per operator)². In October this year, Ofcom allocated 800 MHz of 26 GHz spectrum to each UK operator².

mobile operator or not – rather than how the spectrum licence can be used – fails to reflect the emerging environment where there will be many different holders of spectrum.

- Start preliminary 26 GHz band allocation planning as soon as resources permit. Addressing key allocation and technical issues early will promote certainty and reduce the lead time for allocating spectrum should demand for wide area networks emerge earlier than expected. Further, the current approach risks satellite planning becoming disconnected from mobile requirements undermining future IMT deployments.

The Ministry should further avoid making early 26 GHz decisions in isolation. For example, it is not clear that national “all of NZ licences” rights will not be required given emerging rural use cases and geographic separation requirements or that proposed new EESS and SRS radio licences can be effectively managed. We support the proposed tight controls on any new EESS and SRS radio licenses.

Satellite early access to the lower 28 GHz band and pricing

We further do not support proposals to allocate lower 28 GHz band licences to satellite ahead of finalising FWA and private network access arrangements and to provide satellite access to the band for no charge other than the standard \$150 per licence administrative fee.

There is increasing convergence of satellite and IMT markets and spectrum requirements, with satellite-based service providers competing with terrestrial providers. However, the proposed approach gives satellite preferential access to spectrum and spectrum prices. This is not competitively neutral and will inevitably undermine competition and investment in terrestrial infrastructure. The Ministry should work to make spectrum available to both satellite and mobile providers at fair prices.

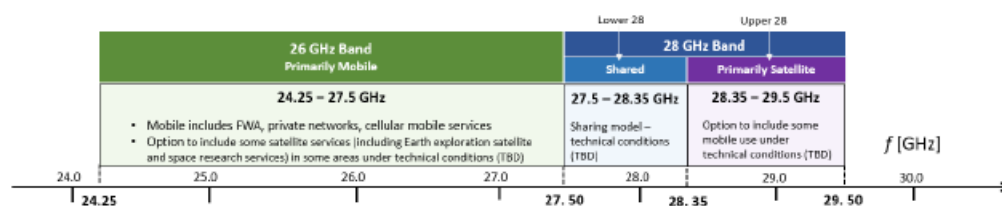
We agree that the Ministry should not set prices or structure allocations solely to maximise revenue, pricing is one of the tools available to the Ministry to promote efficient use of spectrum. However, in this case, the Ministry’s proposed approach fails to reflect the opportunity cost of allocating spectrum to satellite. The proposal is based on there being minimal if any competing demand for spectrum in the lower 28 GHz band. However, the lower 28 GHz band could have been used for wide area mobile deployment if not for the Ministry’s proposed allocation methodology. In other words, the cost of reserving the band for satellite is that the spectrum cannot be used for mobile deployment and may potentially create scarcity in the 26 GHz band when none is warranted.

Therefore, at this stage, the Ministry should determine that any spectrum rights allocated in the lower 28 GHz band will be subject to incentive prices equal to the price (if any) set in the 26 GHz allocation process.

Introduction

1. Thank you for the opportunity to provide feedback on RSM's 24 - 30 GHz spectrum allocation technical paper (**the paper**).
2. Cabinet earlier agreed in August 2023 that:
 - a. The 26 GHz frequency band be allocated primarily to mobile service use, with the option to include some satellite services in specific areas of the country under technical conditions.
 - b. The 28 GHz band is to be split into two portions:
 - i. the 27.5 – 28.35 GHz frequency range, which is to be shared between mobile and fixed-satellite services (Earth-to-space) (including its applications, e.g., Earth Station in Motion (ESIM)) with the appropriate sharing model.
 - ii. the 28.35 – 29.5 GHz frequency range will be allocated primarily for satellite services, with the option to include some mobile use under yet to be defined technical conditions.

Bands under consideration: from the Ministry consultation paper



3. The 26 GHz and lower 28 GHz bands are important pioneer 5G bands for IMT services with significant international support. The bands' ability to deliver ultrahigh-capacity, low-latency connectivity make them uniquely valuable for applications such as fixed wireless access, enterprise private networks and high-traffic venue deployments. It is an important component of the global 5G landscape.
4. Governments have further largely identified and harmonized mmWave bands, allocating up to 1000 MHz of spectrum to operators. ACMA allocated the mmWave band to mobile operators in 2021³. In October this year, Ofcom allocated 800 MHz of 26 GHz spectrum to each UK operator⁴.
5. The commercial use cases and device ecosystem continue to emerge. The GSA reports that – as of mid-2025, 203 operators in 56 countries are investing in mmWave 5G⁵. Twenty-four operators in 17 countries have fully launched mmWave-based 5G networks, while 65 operators are still in testing or limited deployments. Equipment vendors support over 150 mmWave

³ [Auction summary – 26 GHz band \(2021\) | ACMA](#)

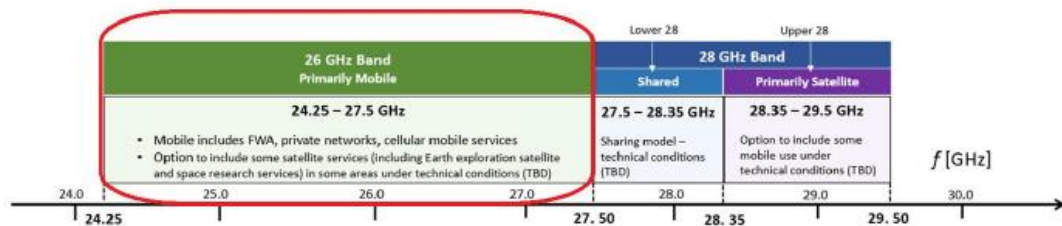
⁴ [mmWave Auction](#)

⁵ See GSA, *Hot Topic Millimetre Wave, July 2025*

devices to date. And while there are only a limited number of wide-area IMT deployments to date, operators like Verizon, AT&T, and T-Mobile in the U.S. have deployed mmWave for stadiums, downtown hotspots, and FWA services.

6. The Ministry is seeking feedback on proposed use cases for the bands, technical conditions, allocation mechanism and pricing of the bands.

26 GHz and lower 28 GHz band licensing, award mechanisms and pricing



7. We support Ministry proposals to allocate the 26 GHz band to IMT services (with limited set asides for EESS and SRS receive only earth stations at specific locations) and sharing with satellite in the lower 28 GHz band.
8. However, the Ministry further proposes – on the assumption that there is no immediate mobile sector demand for access to the 26 GHz band - to delay considering allocation further until sometime between 2028 – 2030. Spectrum would be available to providers sometime after 2030. Further:
 - a. No licence applications will be accepted until after 2030.
 - b. Parties who access to the 26 GHz band will be ineligible to access the lower 28 GHz band, and
 - c. Assignment should be on a geographic area basis (e.g., urban areas) - a national all of NZ basis is not appropriate.
9. The Ministry plans to take a similar approach to the lower 28 GHz band, implying that mmWave spectrum will not be available for FWA and private network applications until sometime after 2030.
10. Our key concern is that the Ministry's proposed approach fails to recognise the wider context and – accordingly – risks holding up the deployment of IMT services and infrastructure. Under the proposed approach, spectrum will be available to NZ providers over 5 years after being made available to operators in economies we compare ourselves to such as Australia, USA, UK, Germany and Japan, and at reduced quantities. Parties would have no certainty over the allocation process and technical conditions to plan their investments until close to 2030.
11. In our view, the proposed approach:
 - a. Will unnecessarily delay the availability of spectrum to providers and availability of new services to New Zealand consumers. New Zealand infrastructure deployment

will always lag the economies we compare ourselves to if the Ministry only considers the allocation of spectrum when there is known demand or deployments. Delaying policy and technical considerations results in mobile providers having little certainty over access to spectrum on which to plan investment.

- b. Risks New Zealand becoming disconnected from the approach taken in major overseas economies. New Zealand spectrum policy – to date – has sought to align with developments in major overseas economies as the best means of mitigating the risk associated with operating in a small market.

A phased approach to making 26 GHz and lower 28 GHz bands available for IMT deployment

- 12. We appreciate that the Ministry is juggling competing priorities for its technical resources. The Government faces critical decisions relating to the renewal of the 2300, 2600, 700, 850 and 900 MHz bands and new allocation of 600 MHz and 6GHz bands. These are important bands for providing services to existing customers and new services to rural communities.
- 13. If technical resource constraints are unable to be addressed, we agree that the allocation of the 26 GHz and lower 28 GHz bands could be briefly deferred until after the allocation of the upper 28 GHz. But even in that scenario, the Ministry must consider how it might mitigate the risks associated with that approach.
- 14. A phased approach could provide early certainty to IMT operators and mitigate the risk that spectrum availability holds up critical infrastructure deployment. We recommend that the Ministry:

- a. Make geographic licences available in the lower 28 GHz band for FWA and private network deployments immediately or – at the latest - at the same times as shared use licences are available for satellite deployment in the band. FWA and private network deployments are already being deploying in this band in overseas markets.

Further, as noted in our response to the 3340-3460 MHz band consultation, private network providers will require spectrum in higher bands to support the bandwidths necessary for some private network use cases. The lower 28 GHz band is a key band for supporting this use case.

- b. Permit parties to hold licences in both the 26 GHz and 28 GHz bands – i.e., not prohibit parties who hold 26 GHz spectrum from holding lower 28 GHz licences - differentiating based on how the license is used (use case) rather than the identity of the party. While we appreciate that the Ministry may wish to prevent parties from aggregating geographic licenses to replicate a national management right, the Ministry can manage this risk through 28 GHz licence allocation rules and practices.

In any case, rules that prevent parties from accessing national management rights and specific private network licences are unlikely to be effective and can limit parties' ability to meet the needs of private network customers.

- c. Undertake preliminary policy work on the s26 GHz band, providing more certainty for future management rights holders and shortening the allocation lead time should the market develop more quickly than expected. While there are a limited number

of wide area deployments today, authorities have allocated spectrum to major international operators, and the market context could quickly change.

Other conditions

National all of NZ licences for 26 GHz band and other conditions

15. The Ministry further proposes not to allocate national “all of NZ licenses” to MNOs in the 26GHz band.
16. In our view, the 26 GHz band should be a nation-wide management right subject to co-ordination with EESS and SRS as proposed. While we cannot predict all deployment scenarios as the market matures, we will likely see use cases in both rural areas (FWA) and urban areas (capacity and very high t-puts) which are more effectively managed through national management rights.
17. Nonetheless, decisions over licence parameters such as whether rights are national or geographic should not be made in isolation as proposed. This matter could be considered better as part of the deferred consideration of the allocation process, i.e., not a decision that can be made now.

EESS and SRS radio licences in the 25.2 - 27 GHz range

18. The Ministry proposes that new EESS and SRS radio licenses could also be approved in the 25.2 - 27GHz range.
19. We support tight controls over any new EESS and SRS radio licence sites. Expanding EESS and SRS locations could have significant implications for future IMT deployment in the band. The 26GHz band is not the only option available for EESS and SRS links and these alternative bands should be preferred. While the Ministry may have limited ability to refuse new licences - these are international services with limited control over use in NZ- these should only be located on existing satellite farm locations to ensure geographic requirements do not impede mobile deployment.

Ministry's 26 GHz questions

Use cases and existing spectrum users

1. Do you agree with RSM's proposed new spectrum uses outlined in Section 1.1? If not, provide details on the modifications you wish to propose with appropriate reasoning.

20. We are aligned with MBIE's spectrum approach to the 26 and 28 GHz bands. But there is one exception. It is stated that MNOs are prohibited from using this spectrum. Our reasons for this exception are discussed later in this response.

2. Do you agree with RSM's assessment of the impact on existing users within 23.6 – 24 GHz, 24 – 24.25 GHz and 24.25 – 27.5 GHz, including the proposed technical and operational considerations, as well as technical conditions for the protection of EESS (passive) and potential RAS use in 23.6 – 24 GHz from future Mobile Service emissions in the adjacent 24.25 – 27.5 GHz band? If not, please provide further specific technical details and rationale, including technical studies.

21. The MBIE has done an excellent analysis of the existing users. We have little to add. Any equipment that we deploy in the 26 GHz band will be compliant with WRC conditions. As far as existing services in the 26 GHz band we will need to define specific co-existence conditions. We have comments on the data rates tables (4 and 5) as they are derived from ITU R M 2410 that is not directly applicable to systems deployed.

3. Are you aware of other locations apart from those listed in Table 3 which would be likely be used for RAS within New Zealand? If so, please provide details of these locations including the technical and operational parameters of the RAS receiver along with supporting material showing firm plans to establish a site at these locations.

22. No comment.

4. Are there any further application/system details you wish to provide which qualifies as an existing user?

23. No comment.

Spectrum requirements for enabling different services and applications

5. Do you agree with RSM's understanding of the spectrum requirements and key usage scenarios for enabling different services and applications (e.g., Mobile Service, EESS and SRS) in 24.25 – 27.5 GHz?

24. We agree with MBIE's assessment of services but with new services being considered as part of 6G, it is likely the compendium of services may change in future.

6. What are your spectrum estimates for the use of Mobile Services, EESS and SRS in 24.25 – 27.5 GHz which you wish to implement or use? Present a technical analysis with appropriate justification.

25. We expect MBIE should allocate – consistent with the economies we compare ourselves to - up to 800 MHz to each operator. Technical analysis with spectrum estimates would involve disclosing proprietary information. But from recent discussions in ITU R WP 5D, spectrum requirement per user for say entry level immersive reality services is 30 Mbps. Using MBIE's table 5, for 800 MHz only 3 such users can be supported at the cell edge.

26. The Ministry should consider per operator allocations made by overseas authorities in major markets we wish to follow. Major equipment providers and operators are putting significant resources into developing new services based on network capabilities, and these will include use of spectrum bandwidths available to providers.

7. Can you provide a link budget of a system which you plan to operate in 24.25 – 27.5 GHz, which will assist RSM to better plan, allocate and assign this frequency range?

27. Link budgets are vendor proprietary and cannot be disclosed.

8. Do you plan on operating mobile systems that are not standardised by 3GPP? If so, what type of equipment do you plan to operate and what are its technical characteristics? Where possible, please provide the relevant supporting technical documentation.

28. Spark will deploy 3GPP compliant systems. Base stations will be as per 3GPP 38 104 and UEs as per 3GPP 38 101x.

Proposed technical conditions

- 9. Does the mobile BS and UE you wish to operate within 24.25 – 27.5 GHz have unwanted emissions falling within 23.6 – 24 GHz of –39 dBW/200 MHz for BSs and –35 dBW/200 MHz for UEs? If so, could you provide details of the unwanted emission mask as a function of frequency? If not, could you provide the unwanted emissions limits of the equipment you wish to operate with the necessary technical justification?**
29. Our equipment will be compliant with WRC 19 conditions as given in 3GPP 38 104. We do not have emission masks other than what is defined in 3GPP recommendations.
- 10. Does the mobile BS you wish to operate meet the –60 dBW/MHz Category B spurious emissions limit from Recommendation ITU-R SM.329? If not, what do you propose for the necessary protect EESS (passive) receivers in 50.2 – 50.4 GHz and 52.6 – 54.25 GHz from the second harmonic of mobile BS emissions within 24.25 – 27.5 GHz?**
30. Our equipment will be compliant with WRC 19 conditions as given in 3GPP 38 104. We do not have specific values of spurious emissions other than what is defined in 3GPP recommendations.
- 11. Do you agree with our 5% quantification for the use of the terms “very limited” number of BSs operating in 24.25 – 27.5 GHz that are expected to communicate with a positive elevation angle towards indoor mobile UEs? If not, what technical modifications would you suggest to this quantification?**
31. Typical values of down titles are between 2- 5 degrees. We do not have cases of up tilted base stations.
- 12. For mobile system deployments envisaged in 24.25 – 27.5 GHz, what are the typical range of values for electrical and mechanical tilts which you intend to use? Do these parameters relate to the deployment environment (i.e., urban, sub-urban, etc)? If so, provide details of the relationship.**
32. Please see question 18.
- 13. How would you mathematically characterise the term “normally” pointing the BS below the horizon, as quoted in “resolves 2.1” of Resolution 242 (WRC-19)?**
33. Please see question 18. Up tilting does not exist or the number of cases are outside the third standard deviation.
- 14. What would be your mobile BS’s typical elevation beam steering range and would the composition of the BS antenna array cause grating lobes to occur? If so, would you be able to quantify the direction and magnitude of these grating lobes?**
34. We have no information on mm wave arrays. But the elevation steering range is given by the well known equation:

$$d_g = \frac{\lambda}{1 + \sin \theta_g}. \text{ Where } d_g \text{ is } 0.7 \text{ lambda.}$$

15. What type of TDD synchronisation options would you prefer and why? Do you prefer to have a default frame structure? What do you consider the underlying technical conditions to manage the any potential interference should be?

35. Most likely it will be the same as existing C band but with an SCS of 60 KHz.

16. Do you agree with RSM's assessment on the need to design exclusion areas around the proposed EESS and SRS (space-to-Earth) sites in 25.5 – 27.0 GHz to protect them from aggregate Mobile Service emissions in 24.25 – 27.5 GHz? If not, what other technical alternative(s) would you suggest?

36. We are fine with this.

EESS, SRS and RAS radio licensing

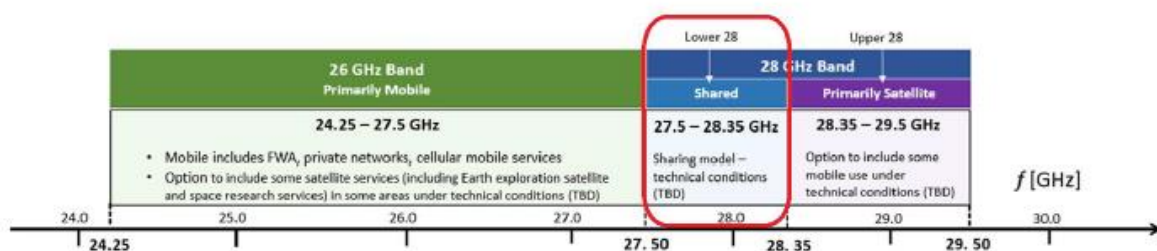
17. Do you agree with RSM's assessment of the licencing framework for EESS (space-to-Earth) and SRS (space-to-Earth) anticipated to operate in 25.5 – 27 GHz? If yes, provide your reasoning. If no, which other alternative would you suggest to licence these services and why?

37. As noted above, at most these should be limited to existing satellite farm locations.

18. Do you agree with RSM's assessment of the licencing framework for RAS operating in 23.6 – 24 GHz? If yes, provide your reasoning. If no, which other alternative would you suggest to licence these services and why?

38. No comment.

Lower 28 GHz band pricing and licencing considerations



39. The Ministry proposes that the band will provide for:

- Current and new FSS (Earth-to-space) gateway Earth stations/sites and user terminals at fixed locations (not in motion).
- FSS (Earth-to-space) ESIMs for Aeronautical (A-ESIM) and Maritime (M-ESIM) under specific technical conditions, and

- c. FWA and/or private networks in dedicated/specific areas of the country on a *shared* basis with the existing and new FSS use. Further consideration of the assignment process for mobile will be delayed until between 2028 – 2030, with access available at some after that.
40. FSS would have priority outside urban areas. In urban areas, the Ministry is seeking feedback on whether mobile should have priority or mobile and FSS should have equal priority. Parties who get access to 27.5 - 28.35 GHz will be ineligible to have access to 24.25 - 27.5 GHz.

Satellite early access to the lower 28 GHz band and pricing

41. We further do not support proposals to allocate lower 28 GHz band licences to satellite ahead of finalising FWA and private network access arrangements and to provide satellite access to the band for no charge other than the standard \$150 per licence administrative fee.
42. There is increasing convergence of satellite and IMT markets and spectrum requirements, with satellite-based service providers competing with terrestrial providers. However, the proposed approach gives satellite a competitive advantage through preferential access to spectrum and discriminatory spectrum prices. This is not competitively neutral and will inevitably undermine investment in terrestrial infrastructure. The Ministry should work to make spectrum available to both satellite and mobile providers at fair prices.

Discriminatory access to spectrum

43. While the Ministry proposes to defer planning and allocation to IMT until sometime after 2030, it will work to provide certainty to satellite users of the band from 2026.
44. Spectrum should be available in shared bands to both satellite and mobile providers. As noted above, there are already FWA and private network deployments in other economies and the proposed approach risks delaying these services in the NZ market.
45. Early satellite end user terminal access to the band risk – with geographic separation required for interference management purposes – compromising FWA and private network access to the band.

Discriminatory pricing

46. The Ministry further proposes that there be no charge for use of spectrum in the band other than a \$150 per licence annual administrative fee.
47. The Ministry notes that it would use market mechanisms (e.g., auctions or incentive pricing) to enable spectrum access in situations where demand for spectrum is greater than supply. This helps to ensure spectrum is used efficiently and goes to the most efficient operators. The Ministry considers that – in this case - there is insufficient evidence to suggest that demand for spectrum will be greater than supply in the lower 28 GHz band. Mobile Services are considered unlikely to have much demand for 28 GHz spectrum due to the limited global uptake of mobile technology at these frequencies and ability to access spectrum in the 26 GHz band.
48. We agree that pricing shouldn't be used for revenue purposes and that pricing is one of the tools available to the Ministry to promote efficient use of spectrum. For the same reason, the Ministry

should avoid creating artificial scarcity through spectrum planning or distortionary high prices when setting renewal or reserve price.

49. However, in our view, the Ministry has taken an overly narrow approach to identifying the costs of allocating the lower 28 GHz band to satellite applications. The Ministry's proposed approach to pricing based on a perceived lack of competing demand for spectrum in the bands. However, the band could have been allocated to alternative users. For example, The band is a co-primary band and could be used extensively by mobile for wide area mobile deployments as an alternative to the 26 GHz band. There is likely to minimal mobile use in the band, but this is solely due to the Ministry's planning and allocation decisions.
50. The opportunity cost of reserving the band for satellite is that the spectrum cannot be used for mobile deployment (potentially creating scarcity in the 26 GHz band). Accordingly, the Ministry should set out now that any spectrum allocated in the lower 28 GHz band will be subject to incentive prices equal to the price of spectrum set in the 26 GHz allocation process. Of course, if there is limited demand in the 26 GHz band, the Ministry would be expected to also set a zero price for access in these bands.

Use cases, sharing arrangements and technical considerations for the lower 28 GHz band

Use cases and existing spectrum users

19. Do you agree with RSM's proposed new spectrum uses within 27.5 – 28.35 GHz, noting the growing demand for FSS (Earth-to-space) GSO and NGSO gateways and user terminals?

51. If this spectrum is shared then access to the shared spectrum should be on equal basis, i.e., restricting MNOs for private network use and even that is limited to some later date when such restrictions are not applicable to satellite use is not an example of equal access.

20. Do you agree with RSM's assessment of the impact on existing users, including the sharing and compatibility scenarios, considerations and overall conclusions in the form of conditions to be met for the protection of existing users such as individually licenced FSS GSO and NGSO Earth stations, as well as FSS satellite receivers operating within 27.5 – 28.35 GHz? If not, please provide further specific technical details and rationale.

52. No comment.

21. Is there any further application/system details you wish to provide which qualifies as an existing user? If so, please provide the details, including any relevant technical information.

53. No comment.

Spectrum requirements for enabling different services and applications in 27.5 – 28.35 GHz

22. Do you agree with RSM's understanding of the spectrum requirements for enabling different services and applications, e.g., FSS (Earth-to-space) and Mobile Service in 27.5 – 28.35 GHz?

54. No comment.

23. What are your spectrum estimates for FSS (Earth-to-space) and Mobile Services (including their applications) which you wish to implement or use in the 27.5 – 28.35 GHz range?

55. No comments.

24. Can you provide a link budget of systems which you plan to operate in 27.5 – 28.35 GHz, which will assist RSM to better plan, allocate and assign this frequency range?

56. No comments.

25. Can you provide further insights into the typical metrics and calculation methodologies often used for GSO to GSO, GSO to NGSO and NGSO to NGSO FSS coordination? In doing so, given an application, how can we ultimately determine the amount of spectrum an FSS operator can ultimately use relative to another, while respecting the provisions contained in Article 9 of the ITU RR? RSM encourages you to share as much detail as possible.

57. No comments.

Options for sharing of 27.5 – 28.35 GHz between Mobile and FSS 1 based on geography-based by area type

58. The paper sets out options for geographic based sharing arrangements. Under the proposed options, FSS would have priority outside urban areas. In urban areas, the Ministry is seeking feedback on whether mobile should have priority or mobile and FSS should have equal priority.

59. None of these options are suitable. Take for example private networks they could both be either be in urban areas and rural areas. Access to this spectrum should be on equal basis and subject to co-ordination.

26. Do you agree with the geography-based by area type option of sharing the 27.5 – 28.35 GHz frequency range between FSS (Earth-to-space) and Mobile Services, as detailed in Option 1? If not, please propose alternatives with the required details for RSM's consideration.

60. Pls see above.

27. Do you agree to divide Option 1 by Part A and Part B by using the Statistics New Zealand defined area accessibility criteria? If not, please suggest an alternative criterion which RSM could use?

61. Pls see above.

28. In accordance with Part A of Option 1, do you agree that L-ESIMs should not be permitted inside major, large, medium, small urban areas and high urban accessibility areas? If not, please provide an alternative with a detailed explanation.

62. Yes.

29. To facilitate the use of the Mobile Service in accordance with Option 1, do you have any suggestions on how RSM could implement coordination of mobile BSs with FSS (Earth-to-space) GSO and NGSO gateways and user terminals? In particular, which coordination trigger and methodology should RSM use (including any relevant reasons)?

63. No comments.

30. In accordance with Part B of Option 1, do you agree that Mobile Service (and its applications) should not be allowed to operate inside medium and low urban accessibility areas, as well as remote and very remote areas? If not, please provide an alternative with a detailed explanation.

64. Pls see 45.

31. Would you like to propose any modifications for Option 1? If so, please provide modifications with relevant associated details.

65. As above, we do not support either option.

32. Do you agree with the geography-based by priority of service type option of sharing the 27.5 – 28.35 GHz frequency range between FSS (Earth-to-space) and Mobile Services, as detailed in Option 2? If not, please propose alternatives with the required details for RSM's consideration.

66. Please see 45.

33. Which areas would you like FSS to have priority over Mobile Services, and vice versa, and why?

67. Please see 45.

34. How would you recommend RSM to calculate the coordination zones described in Part A and Part B of Option 2?

68. No comments.

35. Are there any other suggestions for licencing conditions which you wish to see included as part of Option 2? RSM encourages details of specific conditions for different types of FSS user terminals, e.g., fixed terminals vs. A-ESIMs and M-ESIMs.

69. No comments.

36. Would you like to see any additional technical conditions which facilitate sharing for Parts A and B of Option 2? Describe in detail, the changes you would want to make to this proposal.

37. Do you agree with our approach of ESIM use in 27.5 – 28.35 GHz?

38. Do you wish to offer, implement or use pier-to-pier or gate-to-gate M-ESIM and A-ESIM applications in 27.5 – 28.35 GHz?

39. Is there any other change which you wish to see in our approach for using A-ESIM and M-ESIM? If so, provide the relevant details.

70. No comments.

[End]