

Huawei Technologies d.o.o.
90d, Omladinskih brigada, 11070 Belgrade, Serbia
Phone: + 381 11 2209 608, Fax: + 381 11 2209 607

HUAWEI TECHNOLOGIES D.O.O.
Broj: 233/20
05.11.2020. god.
BEOGRAD



To: Regulatory Agency for Electronic Communications
and Postal Services (RATEL)
Palmoticeva 2, 11103 Belgrade, Serbia

Република Србија
регулаторна агенција за електронске
комуникације и поштанске услуге
Београд
Број: 1-01-34011-5/20-4
05-11-2020
ДАТУМ:

Date: 05.11.2020.



Subject: • **Comments on Public consultations on Draft Rulebook on determination of radio frequency allocation plan in radio frequency band 694-790MHZ**

Dear Sirs,

considering Public consultations, which published on official website Regulatory Agency for Electronic Communications and Postal Services (RATEL) on 14.10.2020 about Draft Rulebook on determination of radio frequency allocation plan in radio frequency band 694-790MHZ, Huawei welcomes the opportunity to comment on this important consultation on the future spectrum availability and assignment.

We aimed to provide remarks to the published questions acting as independent advisor. Since not to all points we are able to provide our contribution, we have excluded aspects to which we feel we could not bring valuable contribution. We hope remarks in this reply will support a definition of a clear regulatory framework in preparing for an assignment procedure.

Huawei sees band 700MHz as essential in enabling 5G wide coverage and provides fully commercial 5G base station solutions already proven in a number of markets working in the indicated 703-733MHz + 758-788MHz FDD spectrum.

We would like to emphasize importance of aiming at allocation the possible widest channel bandwidth per operator. Wider bandwidths provides more flexibility in service use cases and improves both capacity and coverage. Hence, it significantly reduces a network deployment and operational cost per subscriber and therefore provides a rational network investment. Huawei believes that minimum bandwidth of 10MHz channel for 5G is reasonable and should be aimed.

Having its superior coverage characteristics, the 700MHz is critical in efficient provision of country wide PPDR, state IoT services and commercial IoT services. Majority of the countries with recently completed auctions for 700MHz bands prefer deployment of the indicated services directly within commercial MFCN bands, i.e. 703-733 MHz and 758-788 MHz. For example such approach has been used in Finland, France, Germany, Iceland, Switzerland. The other option of allocated PPDR within the guard band has lower terminals availability at the moment, hence it's not dominant solution.



Moreover, across Europe we observe a strong guidance through spectrum distribution policies (in particular 700MHz) towards coverage assurance over not-primarily-business sensitive areas from MNOs point of view, but critical for country digitization (rural areas, existing white spots, roads, railways, etc.). Huawei welcomes such digitization development – oriented spectrum assignment policy, as for example, illustrated recently in Hungary, where operators received significant annual spectrum fee reduction through coverage commitment over selected areas (railways, highways, tourism, and vertical-business-oriented areas).

At the same time, some countries go for building a national 5G network using entire 700MHz MFCN resources to run country-critical services plus share on defined model spectrum to commercial NMOs for usual telecom services – Poland, China, Mexico, Malaysia. Such approach could be also considered by RATEL to use 700MHz band exclusively for selected operator to build a nation-wide 5G network with obligations to accommodate and operate country-sensitive PPDR/IoT services and share resources to competing MNOs.

We are at your disposal for any future information or questions

Sincerely,

A handwritten signature in black ink, appearing to be the Chinese characters "方峰" (Fang Feng).

Mr Fang Feng
Serbia Wireless Network Marketing & Solution Sales Director
Huawei Technologies d.o.o.