



18 May 2001

BY FAX (2121-0420) & BY HAND

The Hon. James Tien Pei-Chun, JP,
Legislative Council Building,
8 Jackson Road,
Central,
Hong Kong.

Dear Mr. Chairman,

Subcommittee on draft Telecommunications (Method of Determining Spectrum Utilization Fees) (Third Generation Mobile Services) Regulation

and

draft Telecommunications (Designation of Frequency Bands Subject to Payment of Spectrum Utilization Fees) Order

We write further to our submission made yesterday which mainly focused on auction rules and policy issues, to express our concerns on the technical issues as well.

Draft Telecommunications (Designation of Frequency Bands Subject to Payment of Spectrum Utilization Fees) Order :

Firstly, the proposed spectrum assignment of Frequency Division Duplex (FDD) operation is not optimal in avoiding adjacent channel interference. For example, the operator with frequency Block#4 may have higher flexibility in minimizing inter-operator interference when comparing to the operator assigned Block#1. We respectfully suggest that the spectrum will be assigned as follows :-

OFTA Proposed		CSL Suggested	
<u>UL (MHz)</u>	<u>DL (MHz)</u>	<u>UL (MHz)</u>	<u>DL (MHz)</u>
1920.3-1935.1	2110.3-2125.1	1920.1-1934.9	2110.1-2124.9
1935.1-1949.9	2125.1-2139.9	1935.1-1949.9	2125.1-2139.9
1950.1-1964.9	2140.1-2154.9	1950.1-1964.9	2140.1-2154.9
1964.9-1979.7	2154.9-2169.7	1965.1-1979.9	2155.1-2169.9

Secondly, the impact of adjacent channel interference between Time Division Duplex

(TDD) carriers and FDD carriers is not known. We respectfully suggest to migrate one of the proposed assignment of the TDD frequency block (1914.9 - 1919.9MHz) to the other frequency in the TDD band. This would reduce the risk of unexpected interference problem between TDD and assigned FDD frequency block at 1920.3MHz.

Thirdly, the impact of adjacent channel interference between TDD carriers is not known. We respectfully suggest to have an additional guard band between each TDD carrier.

Again, we trust the above information is valuable and should deserve serious consideration.

Your kind attention in this matter is much appreciated.

Yours faithfully,

Hubert Ng
Chief Executive Officer