



Digicel

July, 9, 2013

Regulatory Authority of Bermuda
3rd Floor, Cumberland House
1 Victoria Street
Hamilton HM 11

Dear Mr. Philip Micallef

Regarding Digicel Bermuda's request for additional spectrum in the 900MHz range.

Exact spectrum required

Uplink 897-902 MHz and Downlink 942-947 MHz.

Reason why this spectrum is needed.

We have been assigned 1900 Mhz Spectrum which has inferior indoor coverage when compared to CellOne who has been assigned 850 Mhz. In the recent past we have received a plethora of complaints from our Customers (both Corporate and Domestic) with reference to our indoor coverage. We are deeply concerned that we are starting to lose customers to CellOne because of poor indoor coverage. We are confident that the 900MHz band of spectrum will immediately benefit our indoor coverage.

The 900MHz spectrum will be used for WCDMA and GSM technology between cell sites and handsets. 900MHz reaches a wider geographical area and can provide better indoor coverage compared to 1900MHz which Digicel is currently using. Digicel needs to be able to compete on equal terms with CellOne which uses 850MHz which gives them an unfair advantage compared to Digicel. If Digicel would be using 900MHz, fewer towers would be needed for future coverage expansions. This would able Digicel to continue to offer wireless phone and data services at competitive rates since less investment for new sites is needed. This would also mean less intrusion in areas where the residents opposes the introduction of new cell site towers.

Number of proposed customers

The 900MHz access network would be available to all our customers. Any Digicel customer or incoming roamer with a 900MHz compatible phone will be able to connect.

Geographic coverage serviced by spectrum requested

Digicel will use the 900MHz spectrum island wide. The coverage area will be larger than the existing 1900MHz coverage.

Regards

Bjorn Otterclou
Radio Frequency / Transmission Manager

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