I.L. TelNet Holding Ltd

ΕΓΓΡΑΦΟ ΔΗΜΟΣΙΑΣ ΔΙΑΒΟΥΛΕΥΣΗΣ ΓΙΑ ΤΗΝ ΕΞΟΥΣΙΟΔΟΤΗΣΗ ΣΥΣΤΗΜΑΤΩΝ ΑΣΥΡΜΑΤΗΣ ΠΡΟΣΒΑΣΗΣ

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E10

We partially agree but we believe more bandwidth should be offered. This action will benefit the customers as:

- 1. Using more bandwidth companies can offer advance services to the end users.
- 2. Will decrease the interference.

We believe that the above approach has been adapted from most EU countries. Adopting the above means that the spectrum 3.6-3.8GHz should be offered as well.

We do not believe that there should be any restriction in how a possible mobile service would be offered to the public. Once the appropriate equipment and technology exists we believe the market will decide whether these services have the necessary quality to be purchased.
E3 We agree.
E4 We agree.
E5 We agree.
E6 We agree.
We believe that the above is appropriate depending on how the Backhaul is going to be implemented. If the Backhaul is to be built on the 24.5GHz band then 2X35MHz is suitable for applications. Otherwise if the Backhaul is to be built on 3.5GHz then we believe that the specified spectrum is not enough for any applications. For further details please refer to Answer in question E10.
E8 We agree.
E9 We agree.

In our view the licenses should be issued following two different rounds:

- 1. For those that will apply for the 3.5GHz and/or 25GHz spectrum, and
- 2. For those that will apply **only** for the 25GHz spectrum.

If a company applies for both spectrums and gets a license for the first one (3.5GHz), and on the second round fails to receives the licenses for the second spectrum (25GHz) then the company will not be able to create the necessary backhaul. So, our suggestion is that the companies that obtain a license for the first spectrum (3.5GHz) should have a priority on the second round of the biding procedure for the second spectrum (25GHz). If any licenses are still available on the second spectrum, only then should be made available to others.

E11

We agree.

E12

E13

We strongly agree as it prevents the involvement of a company having a dominant position to apply for a license at the 3.5GHz spectrum.

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E15

It is our opinion that those who will apply for a license should clarify the geographical location that they intend to cover. This should be criteria for granting a license as well as forcing the applicant to cover the 80% of the Cyprus Territory within the specified period.

E16

The under-served areas should be considered the rural areas that are not a t present covered with broadband connection. As regarding the incentives that should be given, we recommend:

- a) Subsidizing a percentage of the end user monthly fee normally charged by the broadband company.
- b) Offer free of charge sites for the installment of the required equipment.
- c) The annual License fee should be subsidized.
- d) Subsidize a percentage on the required investment on the appropriate equipment.

E17

E18

We believe that the license should be granted for at least an initial period of 20 years and then operators should have the option to renew for another 10 years period.

E19

We believe that the license should be terminated if the predefined percentage of the covered area is not achieved within the specified period. Also, it is advisable to terminate the license when the operator can not pay the license fee.

E20

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E23

- Rural and Urban areas
 - Home users
 - Small to large enterprises

All services described under the Triple Play Term

E24

In our opinion, new licenses should be granted at least 5 years after the initial licenses are granted.

E25