



NON-CONFIDENTIAL response by Sure (Isle of Man) Limited to the Communications Commission's Consultation on the Licensing of spectrum in the 800 MHz and 900 MHz bands

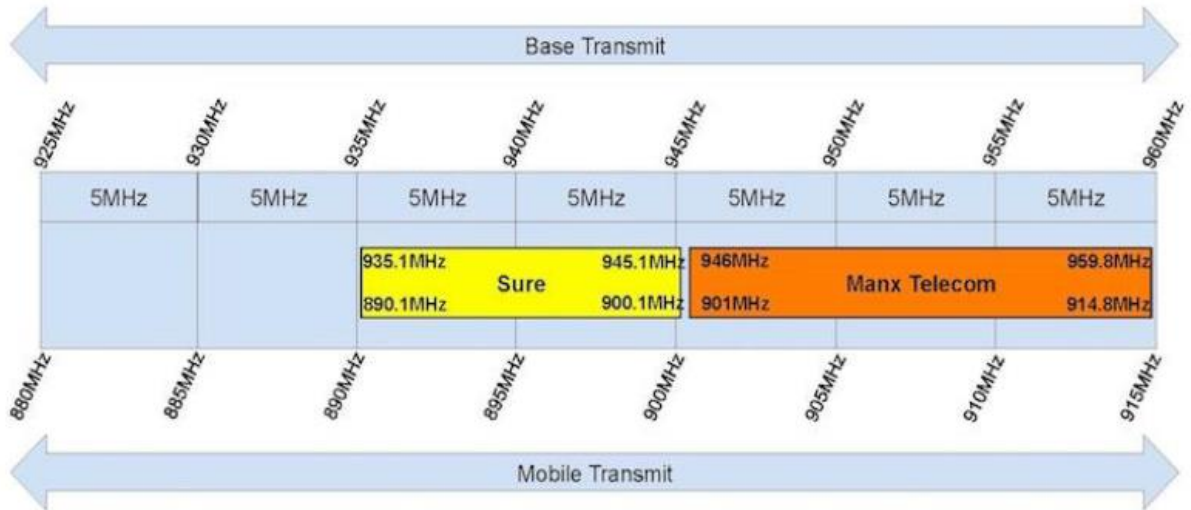
Sure (Isle of Man) Limited ("Sure") welcomes the Communications Commission's ("the Commission's") consultation on the above subject, which was issued by the Commission on the 22nd October 2015.

This is our non-confidential version of our response, which we are happy for the Commission to share with other interested parties and publish it on the Commission's website. Redacted text is indicated by the ✂ symbol.

Sure agrees with the principles of the Commission's proposals with respect to the allocation of additional 800 MHz and 900 MHz spectrum to itself and MT, being the two operators with mobile licences in the Isle of Man. Unfortunately, however, there are technical constraints that would result in Sure providing a potentially significant degradation of services, were the Commission's currently proposed 900 MHz spectrum assignments to be implemented.

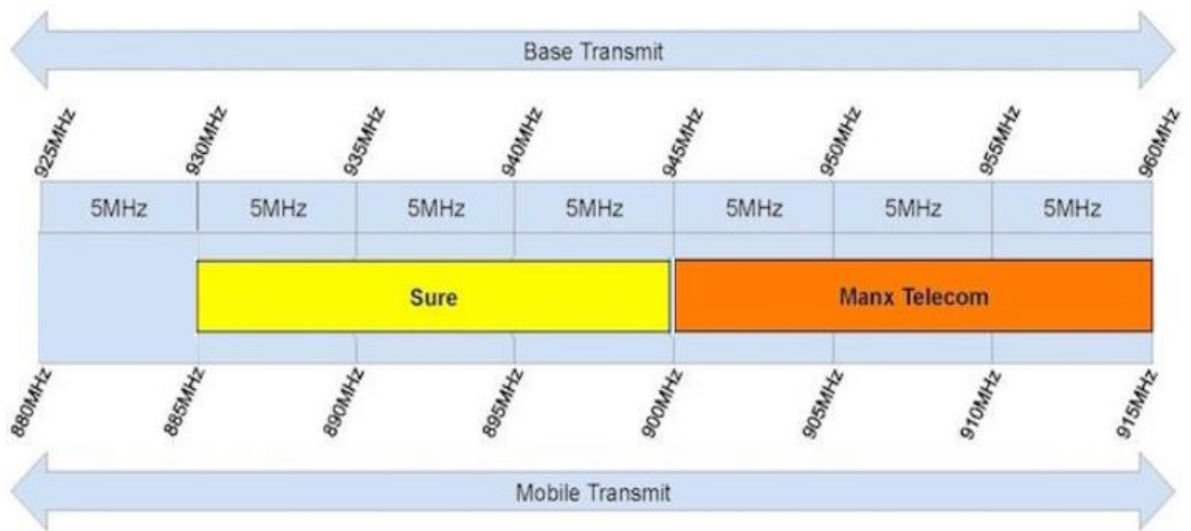
Sure's GSM network hardware is configured to operate only within the P900 (Primary) band, with base transmit frequencies of 935 to 960 MHz and mobile transmit frequencies of 890 to 915 MHz. Our current 10 MHz allocations, which we use solely for our GSM services within that P900 band already sit at the bottom of these ranges (as shown below in the reproduced Figure 3 of the Commission's consultation document¹)

¹ Page 10 of <https://www.gov.im/lib/docs/cc/consultations/800900mhzconsultation22oct2015.pdf>



Sure has requested an additional 5 MHz spectrum allocation in the 900 MHz range, which it intends to use to enhance the quality of [X].

To facilitate the most efficient use of spectrum Sure believes that this additional 5MHz block would be best provided in the 930 MHz – 935 MHz base transmit frequencies, thereby leaving the 925 MHz – 930 MHz range unassigned, as represented below in our amended version of the Commission’s Figure 4.



Whilst we believe that the above proposals could provide the outcomes sought by us and MT in the 900 MHz range we would be amenable to the consideration of a move of our spectrum within the P900 band, were MT able to operate its 900 MHz GSM services outside

of this standard range. This would be dependent on the hardware configuration of MT's GSM equipment, which obviously Sure is unable to comment on.

We are keen to progress matters as soon as possible and would be happy to discuss any aspects of our response further with the Commission.

Sure (Isle of Man) Limited

20th November 2015