

# STAKEHOLDERS COMMENTS/COMMISSIONS RESPONSE ON THE DRAFT LICENSING FRAMEWORK FOR THE USE OF 70/80GHz BAND

10<sup>th</sup> October, 2015

Following the publication of the ~~Commission's~~ ~~draft~~ ~~licensing~~ ~~framework~~ for the use of the 70/80 GHz band for comments/observation from industry Stakeholders and the subsequent submission of inputs from the Stakeholders, the Commission has reviewed the Framework to reflect inputs from the industry.

Please, find below Stakeholders comments/Commissions response on the draft Licensing Framework for the use of the 70/80 GHz band for the information of the industry.

S/NO.	COMMENTS/OBSERVATION/INPUTS	RESPONSE
1.	<p>The Commission should adopt simple, and low cost, light- licensing model.</p> <ul style="list-style-type: none"> <li>• High cost and complex spectrum fees calculations formula.</li> <li>• Adopt discounted multilink registration system instead straight per-link based registration.</li> </ul>	<ul style="list-style-type: none"> <li>• Google may not have the full understanding of how to apply the spectrum fee pricing formular. Hence, the erroneous assumption of high cost.</li> </ul>
2.	<p>Flexibility: the Commission should accommodate antennas with gain as low as 38dBi. "the NCC should ensure that network architecture beyond traditional point-to-point links- including architecture that have not been conceived today can be accommodated"</p>	<ul style="list-style-type: none"> <li>• Considerd.38dBi gain will be incorporated</li> <li>• Other applications will be allowed but that will be subject to approval by the</li> <li>• Commission</li> </ul>

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3.	The Commission should make available entire band(71-76GHz/81-86GHz) instead of 71-74GHz/81-86GHz.	<ul style="list-style-type: none"> <li>71-74GHz /81-84GHz was considered due to availability. Beyond 74GHz and 84GHz have been earmarked for other use in Nigeria</li> </ul>
4.	The Commission should make registration data publicly available	<ul style="list-style-type: none"> <li>This is already captured in the framework.</li> </ul>
5.	The Commission should modify the inspection requirement for certain uses(Type Approval)	<ul style="list-style-type: none"> <li>This is already captured under a sub-heading in the framework. It will be amended to stand on its own</li> </ul>
6.	<p><b><u>Link Registration Database System.</u></b></p> <ul style="list-style-type: none"> <li>MTN is suggesting that a stakeholders consultative forum be held to discuss the online link registration system whenever it is developed,</li> </ul>	<ul style="list-style-type: none"> <li>Accepted.</li> </ul>
7.	<p><b><u>Application Form</u></b></p> <ul style="list-style-type: none"> <li>The Application From (Form EBLL) could not be found online</li> </ul>	<ul style="list-style-type: none"> <li>Accepted. This will be uploaded.</li> </ul>
8.	<p><b><u>Licence Fees</u></b></p> <ul style="list-style-type: none"> <li>Licence fees is high as compared to other Administrations</li> </ul>	<ul style="list-style-type: none"> <li>Following from the example of list of countries provided by MTN, the specified fees is among the lowest</li> </ul>
9.	<p><b><u>Licence Tenure</u></b></p> <ul style="list-style-type: none"> <li>MTN is suggesting 5year duration instead of 1 year.</li> </ul>	<ul style="list-style-type: none"> <li>Most Administrations consider a duration of 1 year.</li> </ul>

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10.	<p data-bbox="342 268 699 304"><b><u>License Processing Time</u></b></p> <ul data-bbox="391 338 927 422" style="list-style-type: none"> <li data-bbox="391 338 927 422">• Maximum Licence processing time of 90days is too long.</li> </ul>	<ul data-bbox="1008 268 1414 436" style="list-style-type: none"> <li data-bbox="1008 268 1414 436">• The framework specifies a maximum of 90 days as stated in the Act, it could be less than that.</li> </ul>
11.	<p data-bbox="342 478 610 514"><b><u>Eligibility Criteria</u></b></p> <ul data-bbox="391 548 927 674" style="list-style-type: none"> <li data-bbox="391 548 927 674">• MTN wants interconnection indebtedness to be included in the eligibility criteria</li> </ul>	<ul data-bbox="1008 478 1414 695" style="list-style-type: none"> <li data-bbox="1008 478 1414 695">• This cannot be consider as there is Service level Agreement (SLA) on interconnection charges among the operators.</li> </ul>