

7<sup>th</sup> May 2019

Nima Farhang  
PLANNING ENGINEER  
Radio Spectrum Policy & Planning  
Commerce, Consumers and Communications Branch, Building, Resources and Markets Group  
Ministry of Business, Innovation & Employment

By email: radio.spectrum@mbie.govt.nz

Dear Nima

### **Technical Arrangements of the 3.5GHz Band**

In response to your discussion document we are pleased to provide the following proposed response to your questions.

1. We agree with the proposed rules of co-existence and the process of change.
2. We are pleased that transmissions in the band will not be restricted to one type of technology and that collaboration and cooperation are encouraged between adjacent providers.
3. Questions 3-6: We agree with the proposed frame structure, special slot arrangement, start TDD frame process, synchronization source and timing alignment.

7. & 9. I have been unable to confirm by the closing date for comments whether or not our Telrad 4G equipment will meet the proposed unwanted emission mask so I am unable to answer those questions.

8. We agree with the choice of EIRP over TRP

10. We agree with the technical compatibility analysis between amateur operation in 3300-3410 and 5G in the 3.5 GHz band. We would also like to suggest that the RSM considers the use of this band for Crown TDD spectrum. The existing usage of this band is very limited and to ensure the best use of all spectrum assets in New Zealand we suggest that allowing regional operators in this band will allow it to be utilised more fully. A number of manufacturers of 3.5GHz equipment, including those utilized in new Zealand, support the 3.3 – 3.41 GHz range for their LTE and proprietary technologies.

11 & 12. We agree with the technical compatibility between SRD devices in 2900 – 3400 MHz and the arrangement for satellite operators from 3800-3840 MHz with 5G in the 3.5GHz band.

Yours faithfully



Peter Mancer

General Manager, Connecta  
Compass Communications Ltd