



APCO Australasia Response to the Discussion Paper issued by the New Zealand Ministry of Economic Development – Digital Dividend – Opportunities for New Zealand August 2011

Response Submitted: 7 October 2011

Question 1. What is the best use of the 700 MHz band in New Zealand? Do you agree that it should be allocated in a mode suited to FDD technologies?

The allocation and use of spectrum is a strategic issue faced not just by the New Zealand Government but by all governments and needs to be considered in the context of:

- Spectrum being a high value asset
- The need to ensure that the asset is appropriately utilised to achieve an appropriate economic and social return
- The move from analogue to digital television presents the opportunity for a once off financial benefit in conjunction with the opportunity to re-farm spectrum

Question No 2. Could or should both FDD and TDD modes be accommodated?

No response

Question No 3. Do you agree that New Zealand should adopt the APT band plan?

If the APT Plan is approved for Region 3 then its adoption by New Zealand would be a strategic decision because it would contribute towards the goal of harmonised spectrum in Region 3.

Question No 4: What alternative options should government consider if international support for the APT band plan does not emerge

It is assumed that in the process of developing the recommended APT band plan that alternative options were considered which could be re-visited in the context of the reasons for not approving



the APT recommended band plan. In any event the goal of harmonised spectrum in Region 3 should not be lost.

Question No 5. Should the 700 Mhz band be allocated in 5 Mhz blocks together with natural pairs i.e. 2X5?

No response.

Question No 6. Is there an alternative use for the guard bands and centre gap that should be considered?

No response.

Question No 7. Should a reservation for PPDR broadband use be made in the 700 Mhz band? Why? Why not?

The ideal outcome from a public safety perspective is globally harmonised spectrum (both broad and narrow band) across ITU Regions 1, 2 and 3 to meet both current and future needs of the public safety market (addressing both demand and supply).

The lesser outcome is the harmonised spectrum (both broad and narrow band) within each ITU Region with an acceptable level of interoperability between Regions.

There is a need to reach a balance between the allocation of specific spectrum for public safety purposes and spectrum for commercial and other public uses however dedicated spectrum (narrow and broadband) should be provided for public safety communications.

The Business Case for PPDR spectrum needs to be developed by Public Safety Agencies (PSAs) and be robust enough to compete with other sectors to secure both PPDR spectrum and its place in the market. This would allow PSAs to adjust to and take advantage of movement and change in the composition and structure of the market over the life of the spectrum license.

The Business Case would be a key component in determining which band should be allocated to PPDR on the basis of the value of the asset and the ability to create harmonised PPDR spectrum in Region 3.

Consideration also needs to be given to future Regional Trade Agreements as they may apply to the manufacture and distribution of public safety communications equipment to support the demand for public safety services from Regional population and economic growth as we move into the Asian Century.

Question No 8. Should provision be made for a new entrant at some point in the future? If yes how this should be done? If no, why not?

Whilst APCO Australasia supports dedicated PPDR spectrum it also supports appropriate formal and auditable arrangements being put in place to allow access to commercial networks able to provide capacity and capability and hence resilience and scalability in times of major events and natural disasters.

A competitive market capable of supporting new entrants also supports the comments made in response to Question 7 and would allow PSAs to have options in changing commercial arrangements over time to meet changing demand and to take advantage of new technologies. Such arrangements would also provide a contingency for whatever direction broadband may allow multimedia and technology convergence to take in the future.

Question No 9. Should spectrum acquisition caps be applied in the 700 Mhz allocation process?

No response

Question No 10. If yes, what level of cap should be applied? Should caps be specific to 700 MHz or wider?

No response.

Question No 11. Should the Ministry endeavour to ensure that at least one party can access 2 x 20 MHz in the 700 Mhz band? What impact would this have on competition?

No response.

Question No 12. Should implementation requirements be placed on digital dividend spectrum? Why/why not?

This question relates to achieving the best value from the allocation and use of the spectrum in the same manner as any other high value asset. The proposed implementation requirements provide both time frames and the basis for reporting progress towards achieving the goals set for the provision of broadband services.

Question No 13. What form should any implementation requirements take?

Implementation should be left to the operation of market forces within the context of the implementation requirements set.

Question No 14. How should the 700 Mhz Band be allocated and why?

Section 8.2 of the Discussion paper sets out the issues that have to be resolved i.e. the development of 3GPP standards and the rate of uptake of the APT band plan assuming the plan is approved. From the PPDR perspective the development of “mission critical” applications for LTE is equally important and should be addressed in the Business Case to be prepared by the Public Safety Agencies referenced in the response to Question No 7.

Question No 15. Do you agree with the Ministry’s proposed timeframe? Why? Why not?

The timeframe proposed will be largely dependent on the issues identified in response to Question No 14 with the biggest risk appearing to be the development of standards by the 3GPP.

Further contact regarding this submission should be directed to:

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Note: This Submission should be considered in conjunction with the APCO Australasia Response to the Australian Communications and Media Authority (ACMA) Discussion Paper *The 900 Mhz band- Exploring New Opportunities* published on the ACMA website