



15 January 2025

Takuro Arinaga
Chief Executive
Telecommunication Regulation Authority
Federated States of Micronesia
P.O. Box 1919
Pohnpei FM 96941

Subject: **Feedback on Consultation Paper: Proposed Cellular Mobile Spectrum Licensing Framework**

Dear Mr. Arinaga,

Kacific Broadband Satellites International Limited (KBSIL) welcomes the opportunity to respond to the FSM Telecommunication Regulatory Authority's (TRA) consultation on cellular mobile spectrum aggregation limits. We commend the TRA for taking a balanced approach to promote competition, ensure equitable access to spectrum, and encourage innovation within the telecommunications market of FSM.

We broadly support the TRA's objectives outlined in the consultation document, particularly the emphasis on preventing undue concentration of spectrum resources and fostering effective competition. Please find below our response to the consultation document, based on the prescribed format provided:

Information of commenting party

<i>Full name</i>	Hugo Filipe Martins
<i>Organization</i>	Kacific Broadband Satellites International Limited
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<i>Is confidential information being submitted?</i>	No.

Comments

Paragraph number or section of consultation document, or consultation question, that comment pertains to	Comment	Proposed Changes	Confidentiality
Question a	We agree that aggregation limits should be maintained to prevent market dominance, promote fair	Maintain aggregation limits as outlined, ensuring that they are periodically reviewed to	N/A

	competition, and ensure new entrants have equitable access to spectrum. This approach supports TRA's goal of fostering innovation and fair resource distribution.	adapt to technological and market developments.	
Question b	Differentiating aggregation limits for bands below and above 1 GHz is logical and consistent with their respective use cases. Sub-1 GHz bands are critical for coverage, while above-1 GHz bands offer the capacity required for advanced services like 5G.	Continue to differentiate aggregation limits based on band characteristics, and ensure regular monitoring to assess evolving technology and market needs.	N/A
Question c	N/A	N/A	N/A
Question d	The proposed cross-band aggregation limit of 190 MHz for bands above 1 GHz is well-calibrated to ensure adequate capacity for operators while preventing undue concentration. It also allows for sufficient competition among multiple operators.	Implement the cross-band limit of 190 MHz but consider adjusting it based on market evolution and spectrum demands in the medium term.	N/A
Question e	Submitted in confidence	Submitted in confidence	<p>Yes, mark as confidential.</p> <p>Submitted in confidence</p>

Question f	N/A	N/A	N/A
Question g	The proposed in-band aggregation limits for the 1800 MHz and 2100 MHz bands—60 MHz and 50 MHz respectively—are reasonable given the need to ensure fair access to these highly desirable bands. However, further monitoring of demand is advised.	Establish the proposed limits but consider reviewing them biennially to ensure they remain aligned with market dynamics and technological advancements, especially as demand for advanced services like 5G increases.	N/A

KBSIL appreciates the TRA’s initiative to engage stakeholders on the proposed cellular mobile spectrum aggregation limits. The consultation process demonstrates the TRA’s commitment to fostering a transparent, competitive, and innovative telecommunications market in FSM.

Submitted in confidence

Thank you for considering our comments and for the opportunity to participate in this important dialogue. We look forward to engaging further and to contributing to the development of a robust and inclusive telecommunications sector in FSM.

Respectfully,



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Hugo Filipe Martins
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 Kacific Broadband Satellites International Limited