

Broadnet Telecommunications Ltd

REPLIES TO QUESTIONS IN THE PUBLIC CONSULTATION DOCUMENT FOR FREQUENCY BAND 1790-1800

Questionnaire

Q1: Do you agree on the issuing of a license for the usage of frequency 1790-1800 MHz?

YES

Q2: {your opinion} shall we offer one license for the 10 MHz or two for 5 MHz each?

ONE LICENSE FOR 10 MHz

Q3: Do you agree with the suggested conditions and obligations for the usage of frequency 1790-1800?

YES, except for following condition “Before the licensee deploys his system or network, he must proceed with coordination agreements with all the license holder companies that are using neighboring frequencies. “**from Section 2.2. which we propose to be replaced by** “The licensee shall use all necessary precautions and technical methods to avoid interfering with or being interfered by the systems deployed by all the license holder companies that are using neighboring frequencies, including for co-siting of base stations. In particular, the licensee shall conform with ETSI document TS 0.5.05 regarding protection levels for GSM systems.”

Note: The manager should take into consideration that the Netherlands Telecom Agency has adhered to the above proposed procedure, in granting 2 nationwide operating licenses in the band under consideration.

Q4: What services are you interested to offer?

All kinds of mobile broadband data services using Internet Protocol, for consumers, businesses and institutional users.

Q5: Please forward technical information related to your equipment and the network that you're a going to install and deploy.

Please find attached.

Q6: Do you believe that external guard band will safeguard the GSM from any interference?

YES: We have done all the necessary analyses and assessments to this effect, and we are confident that with the proper precautions during network

planning and implementation, no harmful effect whatsoever will impact the GSM networks using the neighboring frequencies.

Q7: {your opinion} what is the maximum power that the equipment will use so that there will be no interference with other systems?

**Composite Output Power: 44.6 dBm
30.0 dBm/stream/antenna
Rated Stream Power: 33.8 dBm/stream
Minimum Stream Power: 13.8 dBm/stream**

Q8: Please advise the geographical zone that shall be obligatory for the licensee to cover.

In our opinion, no specific obligatory coverage zone should be mandated by the manager of the department of electronic communications, of the Ministry of communication and work, except for coverage of the urban areas of the principal cities of Cyprus. The reason is that the provision of affordable alternative broadband data services is highly sensitive to the capital expenditure required for implementation of the network, contrary to the provision of mobile voice services, for which the demand was and remains very strong. Thus, imposing coverage conditions may jeopardize the economy of the system. It is better to let demand and supply take effect, as there will be several competitive systems vying for the same markets.

Q9: Please comment on the time duration of the license.

We agree with the 15 year duration.

Q10: Do you believe that specific criteria must be implemented for the potential licensees?

The participants must have expertise, know-how and previous experience in installing and servicing these equipments and systems.

Q11: Please advice on any other comments that you believe are necessary for the department to acknowledge, even though we did not include in this questionnaire. If you do please document your comments.

The technology to be provided should be environmentally friendly. It is highly advised that this technology uses what is know by Intellicell Smart Adaptive Antennas (ISMA) in order to provide the “pocket of energy” functionality. This maximizes the spectrum efficiency and leads to a minimal number of needed Antenna sites in order to cover a certain area.