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## **Hong Kong Telecommunications Users Group Response to OFTA's "Consultation on Licensing Framework For Deployment of Broadband Wireless Access " dated 20 December 2004**

In response to OFTA's consultation regarding the Broadband Wireless Access, Hong Kong Telecommunications Users Group ("HKTUG") is pleased to provide our comments:

- HKTUG is glad to see development of alternate local loop technology so that users can have more choices available.
- Some of the recommendations imply a connection between frequency allocation and application. This is a transient association and can make any resulting regulation outdated. Use of technology and allocation of spectrum should be separated or at least easily changeable with a mechanism for doing so.
- It is advisable to avoid the use of high frequency spectrum. The higher the frequency, esp., 5GHz and above, the greater the chance of ionization. The greater the risk of ionization, the greater the risk of genetic damage and cancer. We would like to see this to be an explicit consideration, or at least evident in the spectrum design process.
- We would like to see more transparency in the rationale behind some of the recommendations regarding the use of BWA as wireless extension of FTNS operators as this may seem as restrictive in the use of this new technology. If that is so, what are the criteria for removing such protection? If not, then what are the reasons behind some of the recommended use restrictions?

We wish to see that the consultation exercise be completed as soon as possible so that the BWA can be implemented. This will certainly help to provide another alternate mechanism for local loop and would increase the coverage of areas with at least two FTNS providers. The latter is critical and a mandatory condition for removing the Type II interconnection arrangement between PCCW and the other alternate FTNS providers.

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