

CCT comments regarding the Commission's Modified Invitation to Apply for 700, 1900 MHz and AWS-1 Spectrum Award Consolation Document please see the following:

1. **Do you agree with the modified timetable proposed for the Award? If not please give reasons for your response.**
 - ? CCT does not agree with the modified timetable proposed for the Award because we believe CCT, as the provider who was previously prevented from participating in the Award process, is fundamentally disadvantaged by being added after the fact to an already completed or nearly completed process that heretofore did not include CCT. Furthermore considering the Court quashed the Commission's decision to reject CCT's application for the Award process after the process was essentially complete or nearly complete, CCT believes the more appropriate procedure would be to begin an entirely new Award process where all participants have equal opportunity to participate from the very beginning. Lastly, the Award process is hopelessly flawed where one participants is even being allowed to use one of the potential spectrum lots "for the time being and will either successfully bid for it in the Spectrum Award 2016 and retain it or vacate it in good time, as appropriate". However, CCT heretofore has not been allowed such privilege despite numerous request and we cannot understand how this privilege can be viewed as anything but unabashed bias in favor of another provider.
2. **Do you agree with permitting an Applicant to change its Lot preferences (Form E)? If not please give reasons for your response.**
 - ? CCT does not agree with permitting an Applicant to change its Lot preferences because CCT, as the provider who was previously prevented from participating in the Award process, is fundamentally disadvantaged whereby the competing providers now have a second opportunity and certainly more time to consider their Lot preferences verses CCT who is being added after the fact to an already completed or nearly completed process that heretofore did not include CCT.
3. **Do you agree with permitting an Applicant to change Additional Commitments? If not please give reasons for your response.**
 - ? CCT does not agree with permitting an Applicant to change Additional Commitments because CCT, as the provider who was previously prevented from participating in the Award process, is fundamentally disadvantaged whereby the competing providers now have a second opportunity and certainly more time to consider their Additional Commitments verses CCT who is being added after the fact to an already completed or nearly completed process that heretofore did not include CCT.
4. **Do you agree with proposed change to the time frame to agree Undertakings two working days prior to Registration? If not please give reasons for your response.**
 - ? CCT agrees with proposed change to the time frame to agree Undertakings two working days prior to Registration.
5. **Do you agree with replacement of guarantees in the Undertakings with a compliance incentive in the Frequency Authorization? If not please give reasons for your response.**

- ? CCT agrees with replacement of guarantees in the Undertakings with a compliance incentive in the Frequency Authorization.

Additionally, CCT objections to previous 2015 Spectrum Award remain the same in relation 2016 Spectrum Award process especially as concerns Spectrum Caps. The Commission has completely ignored or rejected CCT's objection to the spectrum cap of no more than 60 MHz of public spectrum in bands below 1GHz on the grounds that separate caps should be established for Region 1 and Region 2 spectrum. The Commission seems to have gone back and forth about whether Region 1 or Region 2 spectrum will be given priority in the BVI where spectrum bands overlap but considering the close proximity of the BVI to the North American market and the preponderance of North American tourist arrivals in the BVI versus tourist from the rest of the world, CCT believes the TRC should give Region 2 spectrum priority. However, where Region 1 spectrum is allocated to an operator it should be considered separately from far more valuable Region 2 spectrum. In fact we believe it is categorically unfair to consider CCT's allocation of Region 1 900 MHz Band spectrum against the Commission's 60 MHz spectrum cap for public spectrum in bands below 1 GHz, considering we are the only provider with Region 1 allocated spectrum below 1 GHz.

However, notwithstanding all our objections, CCT is committed to providing the most advanced telecommunications networks available in the BVI and we look forward to the opportunity to deploy new telecommunications services in additional spectrum.

Best regards,

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