

CABLE & WIRELESS

Response to PUC Anguilla

5G PUBLIC NOTICE 2026-1

Consultation on the Allocation, Allotment and Assignment of 5G New Radio Spectrum in Anguilla

1. INTRODUCTION

1.1 Cable and Wireless (Anguilla) Limited dba as Flow is pleased to provide comments on the Public Utilities Commission (PUC) **PUBLIC NOTICE 2026-1 Consultation on the Allocation, Allotment and Assignment of 5G New Radio Spectrum in Anguilla (the Consultation Document)** published January 23, 2026.

1.2 Flow expressly states that failure to address any issue raised in the Consultation Document does not necessarily signify its agreement in whole or in part with any position taken on the matter by the PUC or respondents. Flow reserves the right to comment on any issue raised in the Consultation Documents at a later date.

1.3 Footnotes reference the Consultation Document.

1.4 Please send all responses to this Consultation Document and any matters arising to Jade Reymond at jade.reymond@libertycaribbean.com and Melesia Sutherland at melesia.sutherland@libertycaribbean.com.

2. PREAMBLE

Commission's Work Plan

2.1 Flow acknowledges the following PUC Work Plan identified in this Consultation Document:

- i. *The Government's intent to consult on and update the legislation for the telecommunications sector to make it more suitable for current market conditions. In conjunction, the licensing framework and licences will also be updated'. We thank the Commission for this notice.*
- ii. *... the Commission will be inviting bids from a potential third mobile and or FWA operator... in a subsequent licencing consultation'.*
- iii. *.... a consultation on enabling the provision of internet services by Low Earth Orbit (LEO) satellite providers [will be published]. That might be separate from or combined with a wider consultation on satellite service provision.*
- iv. *... all the relevant spectrum changes will be consolidated and added to as a part of a consultation on an update to Anguilla's Frequency Allocation Table.*

2.2 Flow requests a timetable, even if provisional, for this Work Plan, so that it can plan availability of resources.

Objectives of This Consultation

2.3 The PUC identifies the following objectives:

- i. The consultation seeks views on the 5G spectrum bands that should be made available,
- ii. the amount of spectrum within each band that may be obtained,
- iii. the way it should be licensed and the fees that should be charged.
- iv. The Commission seeks to provide a 5G spectrum plan and a process for assignment that will ensure the effective and efficient use of the spectrum, thereby maximising the total benefits to Anguilla.
- v. It will also be necessary to ensure that Anguilla's licensing approach avoids cross-border interference with neighbouring islands.

New Bands for Mobile

2.4 The PUC states:

¹There is no general primary allocation for mobile services in this band for mobile in ITU Region 2 where Anguilla is located. The bands 546 to 570 MHz and 658 to 690 MHz have been allocated – on a PRIMARY basis - for possible broadcasting use in Anguilla under the agreement. Consequently, we do not anticipate any demand for use by mobile telecoms in this frequency range.

2.5 The PUC notes Bahamas as the exception. Flow also knows that in Jamaica, 632MHz-652MHz (DL) paired with 678MHz -698MHz (UL) is assigned to mobile. This band was previously allocated to broadcasting on a primary basis. We therefore would not agree to foreclose the possibility assignment of 600MHz in Anguilla for mobile. There is global need for more spectrum for mobile which will cause scrutiny of all allocations that can accommodate mobile, so we must prepare for a flexible future.

Next Steps

2.6 The PUC has identified the following next steps. Flow requests a provisional timetable to inform preparation for participation at the relevant stages:

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- After receiving the views of respondents, the Commission will:
 - Determine 5G band allocations and allotments.
 - Determine the assignment process.
 - Advise the Minister on how to update the frequency plan accordingly.
 - Invite applications for 5G spectrum which may include re-allocation of existing bands.
 - Assign 5G spectrum accordingly.
 - Decide on and confirm future consultations and their sequencing

3. FLOW'S RESPONSES TO THE PUC'S QUESTIONS

Question 1. Where 5G NR TDD spectrum is made available should it be possible to assign it on an unsynchronised basis or only on a synchronised basis?

3.1 The PUC provides the following context:

²Agreement has already been reached in the Land Mobile agreement for the parameters where 3400-3800MHz are used in synchronised or unsynchronised fashion (see Table 4). Transmission power at the coastline of the neighbouring island has to fall below the levels identified for synchronised usage (not more than 79 dBµV/m/5 MHz at the receiving coastline) and unsynchronised usage (not more than 15 dBµV/m/5 MHz at the receiving coastline) to avoid harmful interference. That means that operators in Anguilla would have to synchronise with operators in St Maarten and St Martin at least in order to use the higher transmit powers specified. The Commission therefore proposes a general rule that 5G New Radio TDD spectrum should be assigned in Anguilla only on a synchronised basis, including synchronisation with operators in neighbouring islands as necessary. That could exclude mmWave spectrum. However, we invite comments on whether any TDD New Radio band assignments within Anguilla should allow for non-synchronised usage. That would probably require significant guard bands to be used between spectrum assignments'.

3.2 Flow agrees with the PUC that deployment is to be Synchronized for all operators. This is because although operators are expected to receive exclusive, non-overlapping blocks of spectrum—thereby avoiding co-channel interference—international experience shows that unsynchronized TDD can still result in adjacent-channel cross-link interference, particularly downlink-to-uplink interference.

² Pg. 23

3.3 By synchronized operation, we mean that all operators using TDD spectrum align to a common time reference (typically GNSS/GPS) and apply a common uplink/downlink frame timing and slot configuration across their own networks.

3.4 Given Anguilla's small geographic size, short inter-site distances, and proximity to neighboring islands, synchronized TDD represents best practice to ensure predictable performance, protect uplink quality, and simplify cross-border coordination. Synchronization is straightforward to implement and does not require any form of network or commercial sharing between operators.

Question 2. Do you believe that there is any potential harmful interference that could result from the use of mobile services in the 3,400MHz to 3,800 MHz band, or other bands in which operators or potential operators may be interested, because of satellite activities?

3.5 The PUC provides the following context:

³Spectrum is identified for IMT in Region 2 in the range 3,400MHz to 3,800 MHz. The Radio Regulations contain footnotes specifying either that there is limited protection for mobile services from space stations in the case of 3,400 MHz to 3,600 MHz spectrum, or that coordination with neighbouring countries is required where there is coexistence between mobile and space services. In Anguilla, the Commission has not licensed any spectrum for satellite use in these bands and is not aware of anybody using them. However, the Commission invites any comments about possible interference with satellite receivers in Anguilla or neighbouring islands'.

3.6 There is potential for interference with any existing legacy satellite services in adjacent C-band spectrum; however, this risk is well understood and manageable. International deployments demonstrate that IMT-5G and satellite services can coexist through appropriate technical measures such as guard bands, power limits, and filtering. With suitable regulatory conditions, satellite compatibility should not present a material barrier to 5G deployment in Anguilla. We recommend that measures for mitigating and minimizing interference from satellite services be included in the conditions of any satellite licence.

3.7 Notwithstanding, given that there are no satellite providers licensed in the band, in order to protect the quality of 5G for future generations, satellite operators should not be given access to n78 band.

³ Pg. 25

Question 3. Which 5G New Radio spectrum bands should be allocated for 5G in Anguilla and Why?

3.8 The PUC provides the following context:

⁴The Commission is proposing, wherever possible, to make available the following blocks of spectrum for assignment:

- *n28 FDD: 2*5 MHz or 2*10MHz*
- *n78 TDD: 500 MHz mid-band spectrum TDD. This would be split into blocks of 100MHz of contiguous spectrum for subsequent possible assignment. In China, n78 is the backbone of nationwide 5G, with operators using 100 MHz contiguous blocks each, fully synchronised.*
- *n41 TDD: 10MHz contiguous blocks. Four to five such blocks could be assigned to an operator.*
- *n257 TDD (26.5-29.5GHz mmWave TDD): 3 GHz of high-band band mmWave n257 TDD spectrum. That would be allotted in 200MHz, 400MHz or 800 MHz blocks of contiguous spectrum for subsequent assignment. For example, in the USA, the FCC allocated 28 GHz mmWave band, often in 400–425 MHz blocks. In Europe, the CEPT harmonised 26 GHz (24.25–27.5 GHz) into 200–400 MHz blocks¹⁶.*

3.9 Given that 700 MHz (n28) spectrum is already allocated and in use for LTE (Bands 12 and 13), initial 5G deployment should focus on mid-band spectrum. N28 cannot coexist with Bands 12 and 13 because the uplink of n28 will interfere with the downlink of Band 12 and the uplink of Band 13 will interfere with downlink of n28. The result of the interference is that customer would be unable to access the network, that is customer will have no service in the LTE bands. This has been Flow's experience with deployment of 700MHz and n28 where islands are in close proximity to each other.

3.10 The 3.3GHz–3.8 GHz band (n78) should serve as the primary 5G band, offering the best balance of capacity, latency, and ecosystem support. Additional mid-bands such as 2300 MHz and/or 2600 MHz may be considered for capacity expansion and LTE-to-5G migration.

Question 4. Should all available bands be made available for assignment at the same time or should introduction of them be staged? If staged, please indicate reasonable timelines.

3.11 Initial assignment should prioritize 3.5 GHz, followed by supplementary mid-bands as demand grows. MmWave spectrum can be considered at later stages. This approach aligns investment with market demand and avoids premature disruption of existing LTE services. At the same time, we believe flexibility in band

⁴ Pg. 30

assignment is an important consideration and spectrum should be assigned on request, once available, independent of phased releases.

Question 5. What minimum spectrum block sizes should be available for assignment?

3.12 To ensure efficient and economically viable 5G deployment, a minimum of 100 MHz blocks should be allocated to operators:

- In the 3.5 GHz band, a minimum of 100 MHz contiguous spectrum per operator is recommended.

Question 6. What views do respondents have about future spectrum demand?

3.13 Future demand for mobile spectrum is expected to continue growing, driven by video traffic, mobile broadband, massive IoT, simultaneous connected devices and peak tourism usage. With low-band spectrum currently dedicated to LTE, sufficient mid-band availability will be critical to meeting medium- and long-term demand.

Question 7. Do respondents agree that the Commission should seek to assign 5G spectrum based on a beauty contest/comparative selection process where demand > supply?

A Beauty Contest/ Comparative approach should be implemented only where demand outstrips supply. In a small market such as Anguilla, a comparative approach enables the Commission to prioritize efficient spectrum use, credible rollout commitments, service quality, and long-term investment, rather than focusing solely on upfront spectrum pricing. This reduces the risk that excessive spectrum costs could delay deployment or limit coverage and service quality.

Such an approach provides the Commission with flexibility to balance competition objectives with the practical realities of sustainable 5G deployment in Anguilla.

Question 8. Should there be spectrum caps where demand > supply?

We support the use of measured and proportionate spectrum caps, only where demand exceeds supply, provided that such caps are designed to enable operators to acquire sufficient contiguous spectrum to deploy efficient 5G networks.

Spectrum caps should:

- Be band-specific, particularly in mid-band spectrum where wider channels are essential for 5G performance.
- Avoid constraining operators below technically optimal block sizes.
- Be reviewed periodically to reflect market evolution and technology maturity.

Appropriately designed caps can preserve competition while still allowing operators to achieve the scale required to deliver high-quality 5G services.

Question 9. What should be the pricing of the 3.5 GHz band? What is the justification for your proposals?

The PUC establishes the following context:

⁵Current spectrum pricing is contained in the Telecommunications Spectrum Fees Regulations 2015. Annual spectrum fees must be paid not more than 30 days after the anniversary date of the grant of the frequency authorisation. The fees payable with respect to mobile spectrum are specified in Schedules 2 and 3 of the regulations. Those are payable over 10 years with 20% payable in each of years one and two. The remainder is divided by 8 and paid in equal amounts over the following 8 years.....

Therefore, we propose that 100MHz of spectrum in the 3.5 GHz band would be priced at approximately 10% of the total cost of the spectrum assigned to each of the existing mobile operators. That is EC\$ 490,000 for a 10 year licence’.

For operators 5G would be an overlay to current spectrum, adding more operational expenses (power consumption, tower Loading, recurring software cost) and requires high capex Investment for Operators.

Considering the 3.5 GHz block is a wider band, Flow agrees with the PUC to keep the prices 1/10th per MHz compared to currently allocated 1900 MHz in Market.

END

⁵ Pgs. 31-33