



Digicel Response to the Public Consultation

By

THE PUBLIC UTILITIES COMMISSION

On

ALLOCATION, ALLOTMENT AND ASSIGNMENT OF 5G NEW RADIO SPECTRUM IN ANGUILLA

Publication Date: 23 January 2026

Closing Date: 6 March 2026

We thank the Public Utilities Commission of Anguilla for the opportunity to comment on 5G New Radio Spectrum in Anguilla. Wireless (Ventures) Anguilla Limited and Caribbean Cable Communications Anguilla Limited ('Digicel') respectfully submits its comments and responses on the public consultation "*Allocation, Allotment and Assignment of 5G New Radio Spectrum in Anguilla*", published on 23rd of January 2026.

The views submitted herein are not exhaustive and Digicel's decision not to respond to any particular issue(s) raised in this consultation paper or any particular issue(s) raised by any party relating to the subject matter does not generally represent agreement in whole or in part, nor does any position taken by Digicel in this document represent a waiver or concession of any sort of Digicel's rights in any way.

Please do not hesitate to refer any questions or remarks that may arise as a result of the subsequent overview to: -

Name: Ms. Sharo-Ann Chisholm

Designation: Legal & Regulatory Director

Organization: Wireless Ventures (Anguilla) Limited, Caribbean Cable Communications Anguilla Limited

Email: sharo-ann.chisholm@digicelgroup.com

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?

Synchronized (to avoid interference). We recommend that 5G NR TDD spectrum be assigned on a synchronized basis only. TDD (Time Division Duplex) systems share the same frequency for uplink and downlink, alternating by time slot. If adjacent operators use different synchronization configurations, base stations and user equipment from one network can cause direct interference into another network's receivers during conflicting transmission windows. This is particularly relevant in a small geography like Anguilla, where cell sites from different operators may be in close proximity. For example, French St Martin (to the south) has operators actively using 5G TDD spectrum, which could pose a potential threat to any operator within the same band, as signals propagate over water. Mandating synchronization across all licensees using TDD spectrum is therefore a necessary technical safeguard to ensure co-existence, protect service quality, and avoid harmful cross-operator interference.

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?

Yes, if the range is being used for satellite, then there will be potential interference with mobile services. Exclusion zones need to be created where the satellite base is. We recommend that the Commission conduct a detailed investigation into the frequency band to determine these zones.

If these exclusion zones are not identified at the outset, it would be a more tedious process to allow the operator to establish a new site.

Question 3:

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

- Priority 1: N78 (3300-3800mHz) , based handset penetration, N78 has higher percentage:
 - Less investment for mobile
- Priority 2: N41 (2500MHz)
 - Less penetration loss

Priority 1 – Band n78 (3,300–3,800 MHz): This is the globally harmonized mid-band for 5G and currently has the highest device and chipset ecosystem penetration worldwide. The broad availability of n78-compatible handsets reduces the cost barrier for consumers and minimizes the investment required from operators to achieve meaningful 5G adoption. Its balance of coverage and capacity makes it well-suited as the primary 5G band for Anguilla.

Priority 2 – Band n41 (2,500 MHz): This band offers favorable propagation characteristics, with lower penetration loss through buildings and terrain compared to higher frequencies. It provides a good complement to n78, extending indoor coverage and supporting higher traffic loads in densely populated areas.

These two bands together provide a strong foundation for initial 5G deployment, covering both capacity and coverage use cases.

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.

- Priority 1 and Priority 2 can be assigned in Phase 1
- Phase 2 - n257 (mmWave)
- N28 - its not recommended as we are operating on Band12, this might cause UL interference

Phase 1 – Assign n78 (3,300–3,800 MHz) and n41 (2,500 MHz) simultaneously. These bands have mature device ecosystems and are ready for near-term commercial deployment. Releasing them together allows operators to plan integrated network rollouts efficiently.

Phase 2 – Introduce n257 (mmWave, 26 GHz) at a later stage, once device availability, use cases, and operator readiness have matured sufficiently to justify deployment. mmWave is best suited for high-density urban environments and specific enterprise applications, and a staged release allows the market to develop appropriately.

We also advise against allocating Band n28 (700 MHz) for 5G at this time. Our existing operations in Band 12 (700 MHz) overlap in the uplink frequency range, and introducing n28 deployments could cause uplink interference to current Band 12 services, degrading the quality of existing 4G coverage for consumers.

Question 5:

What minimum spectrum block sizes should be available for assignment?

We recommend the following minimum contiguous block sizes to ensure technically viable 5G deployments:

I) **Band n78**: Minimum of 100 MHz per assignment. This is required to achieve the peak throughput and latency performance that defines 5G NR and is consistent with international best practice for mid-band 5G deployments.

II) **Band n41**: Minimum of 100 MHz per assignment, for the same technical reasons.

Assigning smaller blocks would limit the performance benefits of 5G and reduce the return on infrastructure investment for both operators and consumers.

Question 6:

What views do respondents have about future spectrum demand?

To support traffic demands which forecast at 30% YoY growth and with future IOT devices like meters, sensors, Machine to machine that require low latency.

We anticipate significant growth in spectrum demand over the coming years, driven by two primary factors:

First, consumer mobile data traffic is forecast to grow at approximately 30% year-on-year, driven by increased video streaming, connected devices per user, and adoption of 5G-enabled applications.

Second, the expansion of IoT (Internet of Things) deployments including smart utility meters, environmental sensors, and machine-to-machine (M2M) communications will introduce large numbers of low-bandwidth but latency-sensitive connections that require reliable, dedicated spectrum capacity. These cases are particularly relevant to infrastructure modernization in Anguilla.

We encourage the Commission to conduct forward-looking spectrum planning to ensure that sufficient spectrum is available to meet this demand, and to consider reserving or identifying future bands (including additional mmWave and sub-1 GHz allocations) as part of a long-term national spectrum strategy.

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?

We do not support a beauty contest or comparative selection process for spectrum assignments. Such processes are inherently subjective, create uncertainty for investors, and can introduce delays and legal disputes.

Instead, we recommend instead that the Commission adopt an administrative award incentive pricing. This approach promotes regulatory certainty and transparency.

This approach is well-established internationally and is better suited to fostering competition and long-term investment in Anguilla's telecommunications sector.

Question 8:

Should there be spectrum caps where demand > supply?

A spectrum cap refers to a regulatory limit on the amount of radiofrequency spectrum that a single operator may hold within a particular frequency band¹.

The key policy issue is whether spectrum caps should be implemented in circumstances where demand for spectrum exceeds the available supply. In a duopoly market such as Anguilla, this question becomes particularly important. Where one operator's demand for 5G spectrum exceeds that of another operator at the time of assignment, allocating spectrum solely based on immediate demand may allow one operator to accumulate a disproportionate share of a scarce national resource.

Digicel therefore supports the introduction of spectrum caps in situations where demand exceeds supply, as a mechanism to ensure that both operators retain fair and equitable access to spectrum resources and are able to compete effectively in the market. In practical terms, this may require the Public Utilities Commission (PUC) to allocate equal or proportionate amounts of spectrum to each operator, even where one operator may not yet be in a position to immediately deploy the spectrum.

Such an approach promotes sustainable competition, prevents spectrum hoarding, and safeguards long-term market balance in small markets like Anguilla.

¹ International Telecommunication Union, *Economic Approaches to Spectrum Management* (Report ITU-R SM.2012-7, ITU 2025) https://www.itu.int/dms_pub/itu-r/opb/rep/R-REP-SM.2012-7-2025-PDF-E.pdf accessed 6 March 2026

It is recommended that future 5G Spectrum needs by operators should be evaluated by the Public Utilities Commission on a case by basis.

Question 9:

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

We propose that pricing for TDD spectrum in the 3.5 GHz band should be set at no more than 2% of the per-MHz price paid for FDD spectrum, and furthermore that the Commission adopt a total spectrum cost envelope approach across 3G, 4G, and 5G obligations rather than pricing each generation independently.

The current spectrum fee structure in Anguilla is 1M XCD per 5MHz block for both 3G and 4G LTE FDD spectrum. Operators are therefore carrying cumulative fee obligations across multiple generations of spectrum simultaneously, with no reduction in legacy fees as new generations are introduced.

5G NR in the 3.5 GHz band requires a minimum viable block size of 100MHz to deliver meaningful 5G performance. This is technically necessary and is reflected in our response to Question 5. At current FDD per-MHz rates, a 100MHz 5G TDD assignment would cost the equivalent of forty 5MHz FDD blocks, representing a significant step-change in spectrum expenditure in absolute terms.

This is not sustainable when set against realistic 5G revenue projections for a market of Anguilla's size. Even with modest retail price increases for 5G services, incremental revenue uplift is expected to be in the region of 10% in the near term, as 5G adoption is gradual and the consumer base is limited. This uplift is insufficient to absorb a significant new spectrum fee obligation layered on top of existing 3G and 4G commitments, in an industry that is already capital-intensive with tight EBITDA margins.