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**February 9<sup>th</sup>, 2026**

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

Paradise Mobile commends the Public Utilities Commission of Anguilla for taking this important first step toward establishing a clear and forward-looking framework for 5G connectivity. We believe that robust, accessible connectivity is one of the most powerful enablers of economic and social development, acting as a fundamental equalizer that expands opportunity, improves resilience, and underpins modern commerce more effectively than any single technology to date.

We thank you for considering our perspective with regards to the consultation. Below you will find commentary on individual sections from the original document shared by the PUC, in order as it was presented in the original document..

## **5. Benefits to Anguilla from 5G**

The potential sector specific benefits resulting from the arrival of 5G could include:

- Government and finance: Improved e-Government portals and secure payments due to better protocols, broadening financial inclusion for small merchants and vendors.
- Medicine: Ultra-fast speeds and low latency that enables high-quality telemedicine, remote diagnostics, and real-time consultations.
- Tourism: Seamless streaming, contactless services, and augmented-reality guides that improve the visitor experience, while hotels and villas could offer enterprise-grade Wi-Fi over 5G fixed wireless.
- Business: Supporting remote work and global business services, attracting location-independent professionals and enabling local firms to serve clients abroad with cloud apps and video collaboration that does not stutter.
- Utilities: Deployment of smart meters for monitoring distributed solar and batteries.
- Transport and Ports: Tracking vehicles and cargo.

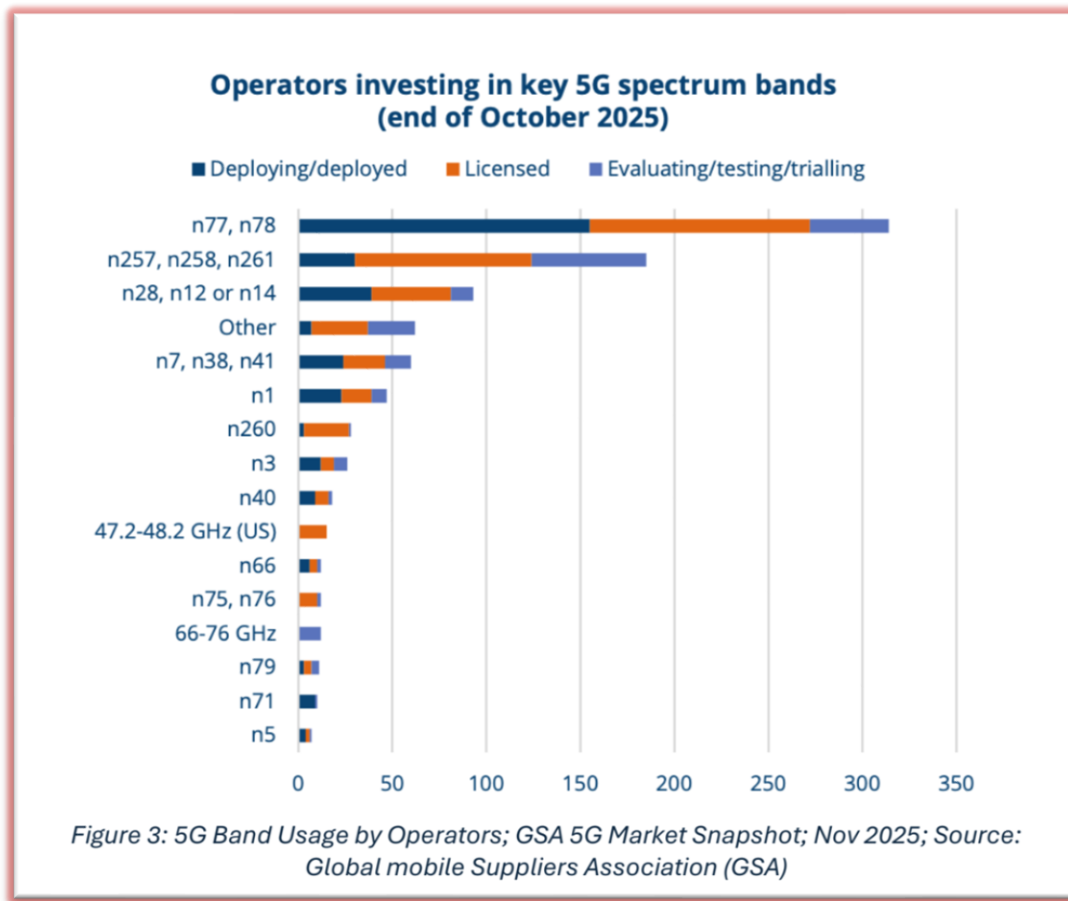
Paradise Mobile agrees with the Commission's assessment of the sector-specific benefits arising from the introduction of 5G in Anguilla. We view 5G as a meaningful accelerator of economic activity, national connectivity, and digital commerce across the island. In our view, this will unlock new economic opportunities within the jurisdiction and further position Anguilla as an attractive destination for foreign direct investment.

| Frequency Band  | IMT Specific Footnotes | ITU Regions covered.                                       |
|-----------------|------------------------|------------------------------------------------------------|
| 450-470 MHz     | 5.286AA                | All                                                        |
| 470-608         | 5.295                  | Some parts Region 2 for IMT, not Anguilla                  |
| 470-698 MHz     | 5.308A                 | Some parts Region 2 for IMT, not Anguilla                  |
| 698-960 MHz     | 5.317A                 | 2                                                          |
| 1 427-1 518 MHz | 5.341B                 | 2                                                          |
| 1 710-1 885 MHz | 5.384A                 | All                                                        |
| 1 885-2 025 MHz | 5.388                  | All                                                        |
| 2 110-2 200 MHz | 5.388                  | All                                                        |
| 2 300-2 400 MHz | 5.384A                 | All                                                        |
| 2 500-2 690 MHz | 5.384A                 | All                                                        |
| 3 300-3 400 MHz | 5.429D                 | 2                                                          |
| 3 300-3 400 MHz | 5.430A, 5.431B         | All                                                        |
| 3 400-3 600 MHz | 5.431B                 | 2                                                          |
| 3 600-3 700 MHz | 5.434                  | 2                                                          |
| 3700 - 3800 MHz | 5.435B                 | Bahamas, French overseas depts and T&T from Caribbean      |
| 3800-4200 MHz   |                        | Not identified for IMT but 3.7 to 4 GHz used for 5G in USA |
| 24.25-27.5 GHz  | 5.532AB                | All                                                        |
| 37-43.5 GHz     | 5.550B                 | All                                                        |
| 47.2-48.2 GHz   | 5.553B                 | 2                                                          |
| 66-71 GHz       | 5.559AA                | All                                                        |

Table 1: Bands identified for IMT; Source ITU Radio Regulations

Respondents are invited to make proposals for appropriate 5G spectrum within IMT identified bands in particular. The Commission is open to considering bands identified for mobile in the ITU Radio Regulations that are of interest even if not specifically designated for IMT, although we do not imagine that is likely.

While the ITU Radio Regulations do not currently list 600 MHz (n71) under a specific IMT identification footnote, the band is widely adopted in 3GPP 5G standards and is regarded internationally as a key coverage layer for 5G deployment. Additionally, ITU-R spectrum outlooks highlight the 600 MHz range as a priority for commercial mobile services, and operators in the region are actively deploying n71 to support expanded 5G coverage. Opening n71 in Anguilla would align national spectrum policy with global and regional practices and support improved coverage, capacity, and economic growth.



We appreciate this kind of insight from a broad range of deployments on a worldwide scale. To note, FR2 (mmWave) deployments are shown separately, as spectrum above 7.2 GHz serves a fundamentally different role than FR1 bands and should likely not be compared in the same chart. These deployments are characterized by short propagation ranges, high site density, and localized capacity use cases, and are not comparable to sub-4 GHz spectrum, which underpins wide-area coverage, mobility, and national network economics.

**a. Land Mobile**

The land mobile agreement concerns the spectrum coordination of mobile radiocommunication networks in the frequency range 698 MHz to 3800 MHz. This agreement was reached in February 2023 between the administrations of Anguilla (AIA), France, Sint Maarten (SXM) and the State of the Netherlands for Saba and St. Eustatius.

The main tables in the agreement have been extracted for reference and are shown in Table 3 and Table 4.

|                                                         |
|---------------------------------------------------------|
| <b>Frequency Usage and Preferential Frequency Plans</b> |
|---------------------------------------------------------|

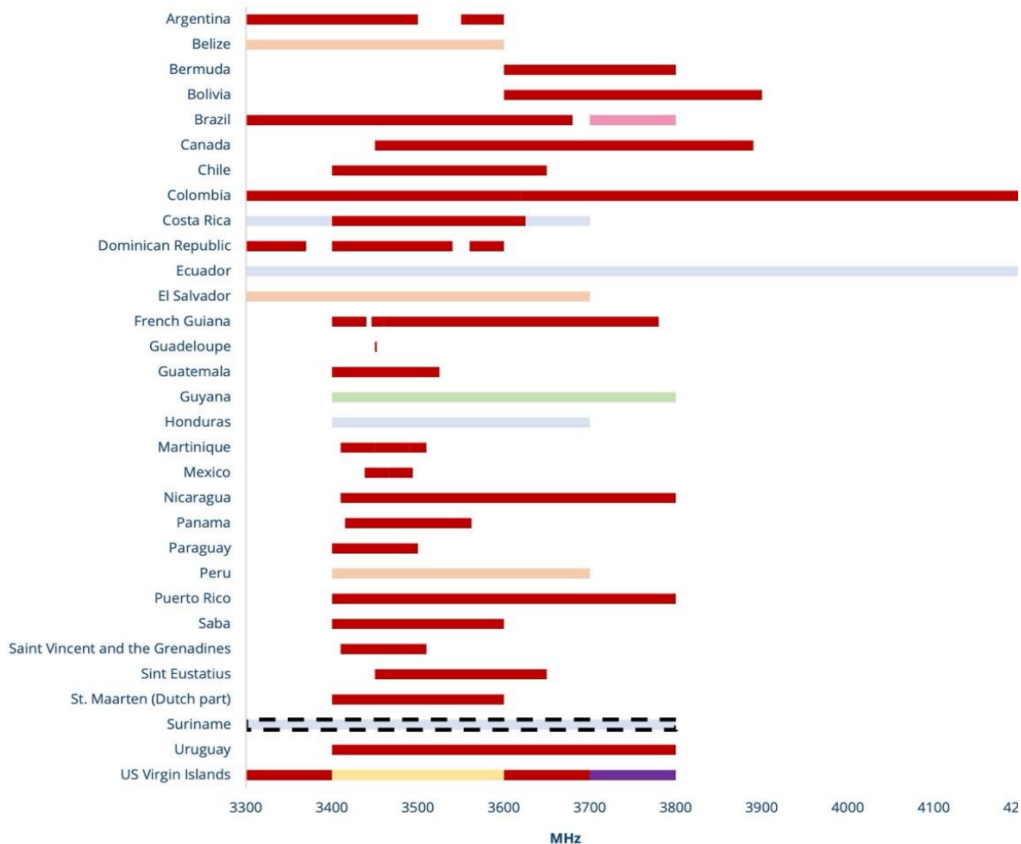
We understand the rationale for defining the land mobile coordination range as 698 MHz to 3800 MHz. However, it is important to note that commonly deployed spectrum in the region also includes Band 71 / n71, as well as n77, which

extends beyond 3800 MHz up to approximately 4200 MHz. Including these bands would materially expand the pool of eligible spectrum in Anguilla by roughly 70 MHz in low-band and up to 400 MHz in mid-band. Both bands benefit from a mature and widely supported handset and radio ecosystem, and their inclusion would support broader coverage, capacity growth, and additional economic activity across the island.

For **low bands** in the Bahamas, Ericsson suggested the 600 MHz and 700 MHz bands (n71, n28) for cost-effective 4G and 5G coverage, particularly in suburban and rural areas. They also recommend considering the 700 MHz band (3GPP n14) for 5G deployment, following the US band plan.

We agree with Ericsson's assessment that low-band spectrum is critical for cost-effective 4G and 5G coverage. Band 28 / n28 represents a more spectrally efficient implementation of the 700 MHz band compared to North American deployments, while remaining fully compatible with existing Band 12, 13, 14, and 17 deployments. Its inclusion materially increases available low-band capacity and materially improves both coverage reach and user experience, making network deployment and expansion more attractive for operators.

### c. Worldwide Benchmark of 5G Use for C Band in ITU Region 2



While this benchmark shows a strong regional focus on n78, several jurisdictions have already extended C-band use beyond 3800 MHz. The initial concerns raised in the United States regarding potential interference with aviation altimeters were subsequently addressed through technical validation and regulatory action, and have since been resolved by the FAA. In the context of Anguilla, there is no technical or economic justification for artificially capping C-band deployments at the upper limit of n78. Opening the full n77 range would materially increase available mid-band spectrum, support higher capacity and performance, and better align Anguilla with next-generation 5G deployment practices that drive long-term economic development.

#### e. Spectrum Block Sizes

Spectrum must be assigned in appropriately sized blocks. Larger contiguous spectrum block sizes using a single carrier are best in terms of data throughput and technical simplicity. New Radio caps a single carrier at 100 MHz in Frequency Range 1 (FR1) and 400 MHz in FR2.<sup>7</sup> Greater bandwidths would require operators to stack carriers via carrier aggregation.

Drawing on industry experience, reasonable block sizes would be:

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<sup>7</sup> [www.3gpp.org/technologies/adding-channel-bandwidth-to-existing-nr-bands](https://www.3gpp.org/technologies/adding-channel-bandwidth-to-existing-nr-bands)

- Low-band: 2\*5 pr 2\*10 (FDD) and 10 MHz or 20MHz contiguous (TDD).<sup>8</sup>
- Mid-band: 80–100 MHz (TDD) contiguous per operator.<sup>9, 10</sup>
- mmWave: 200MHz, 400 MHz or 800MHz (TDD) contiguous per operator.<sup>11</sup>  
Qualcomm has noted that the 26 GHz band is a mature technology adopted in several markets with a mature ecosystem of devices.<sup>12</sup>

We welcome and commend this forward-looking approach by the PUC. At the same time, we caution against drawing direct comparisons between mmWave (FR2) and sub-7.2 GHz spectrum, as the two frequency ranges serve fundamentally different technical and economic roles. FR2 spectrum is optimized for localized, high-capacity use cases, whereas low- and mid-band spectrum underpins wide-area coverage, mobility, and overall network quality. Comparing these bands directly can therefore be misleading and may overstate the practical substitutability of FR2 for FR1 spectrum.

## 15. Existing 5G User Equipment Ecosystem

User equipment (UE) availability worldwide based on 5G New Radio band compatibility is illustrated in Figure 7. The greatest availability exists in 3.5GHz (n77, n78), 2.5 GHz (n41), 1.9 and 2.1 GHz (n1), 1800 MHz (n3, n5 and n8) and 700 MHz (n28).

**Announced 5G device models supporting key 5G spectrum bands (end of October 2025)**

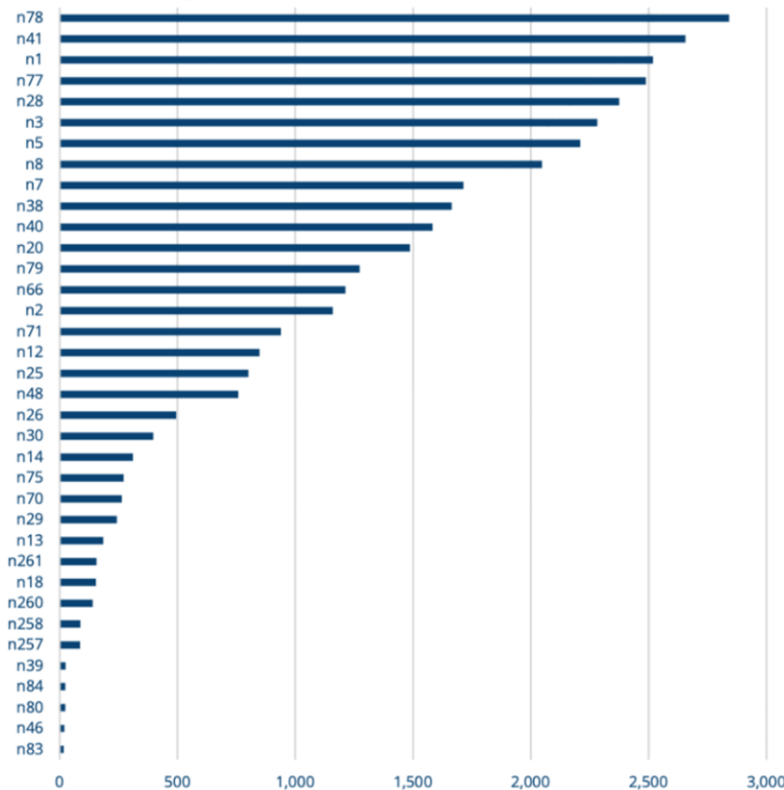


Figure 7: 5G End-user device availability; 5G Market Snapshot; GSA; Source: Global mobile Suppliers Association (GSA)

n78 was introduced as one of the first dedicated 5G bands and was intentionally set aside from existing 4G allocations, a decision that proved both forward-looking and effective. However, as the device ecosystem has matured, it is evident that the majority of additional 5G bands, with the exception of millimeter wave (n257 and above) and n77, which is a superset of n78, have largely emerged through refarming of existing spectrum. This reflects a practical reality in most markets: repurposing incumbent spectrum is typically faster, less contentious, and more economically viable than pursuing new allocations through auctions or prolonged regulatory processes. Due to its nature, n78 does not suffer from regional band fragmentation. It was released as a globally harmonized band and became the first widely adopted 5G spectrum worldwide. By contrast, other bands are subject to regional variations, for example some markets deploy n28, while others rely on n12 or n13, often in parallel. As a result, comparing a globally standardized band such as n78 with region-specific or refarmed bands is not an equivalent assessment and can lead to misleading conclusions.

| NR band | Frequency range                 | Duplex mode   | UE availability ranking & band |
|---------|---------------------------------|---------------|--------------------------------|
| n77     | 3300–4200 MHz                   | TDD           | 4 – n77                        |
| n78     | 3300–3800 MHz                   | TDD           | 1 – n78                        |
| n257    | 26.5–29.5 GHz                   | TDD           | 31 – n257                      |
| n258    | 24.25–27.5 GHz                  | TDD           | 30 – n258                      |
| n261    | 27.5–28.35 GHz                  | TDD           | 27 – n261                      |
| n28     | UL 703–748 / DL 758–803 MHz     | FDD           | 5 – n28                        |
| n12     | UL 699–716 / DL 729–746 MHz     | FDD           | 17 – n12                       |
| n14     | UL 788–798 / DL 758–768 MHz     | FDD           | 22 – n14                       |
| n7      | UL 2500–2570 / DL 2620–2690 MHz | FDD           | 9 – n7                         |
| n38     | 2570–2620 MHz                   | TDD           | 10 – n38                       |
| n41     | 2496–2690 MHz                   | TDD           | 2 – n41                        |
| n1      | UL 1920–1980 / DL 2110–2170 MHz | FDD           | 3 – n1                         |
| n260    | 37–40 GHz                       | TDD           | 29 – n260                      |
| n3      | UL 1710–1785 / DL 1805–1880 MHz | FDD           | 6 – n3                         |
| n40     | 2300–2400 MHz                   | TDD           | 11 – n40                       |
| n262    | 47.2–48.2 GHz                   | TDD           | not listed                     |
| n66     | UL 1710–1780 / DL 2110–2200 MHz | FDD           | 14 – n66                       |
| n75     | DL 1432–1517 MHz                | SDL (DL-only) | 23 – n75                       |
| n76     | DL 1427–1432 MHz                | SDL (DL-only) | not listed                     |
| n263    | 57–71 GHz                       | TDD           | not listed                     |
| n79     | 4400–5000 MHz                   | TDD           | 13 – n79                       |
| n71     | UL 663–698 / DL 617–652 MHz     | FDD           | 16 – n71                       |
| n5      | UL 824–849 / DL 869–894 MHz     | FDD           | 7 – n5                         |

Table 7: Operator band usage and end user equipment availability ranked worldwide

The first observation is that n77 and n78 are both represented, even though n77 is a strict superset of n78. From a policy and planning perspective, treating these as independent choices is redundant. Enabling n77 inherently subsumes n78 and provides greater long-term flexibility with no material downside.

The FR2 bands (n257, n258, n261, n263) are technically valid but of limited practical value in most real-world deployments. Outside of ultra-dense environments such as major city cores or very large venues, mmWave suffers from extreme free-space path loss, poor penetration, and high deployment cost. As a result, widespread commercial deployments have largely stalled, and FR2 cannot be considered a substitute for low- or mid-band spectrum.

Several low-band options listed are overlapping and mutually exclusive in practice. Bands n28, n12, n14, and n17 all occupy adjacent portions of the 700 MHz range. Markets typically select one coherent low-band strategy rather than attempting to support all variants. Among these, n28 is the most globally harmonized and spectrally efficient option, with the strongest device ecosystem and the least regional fragmentation.

In the 2.5 GHz range, bands n7, n38, and n41 are closely related. n41 is the most appropriate choice, as it represents the widest contiguous allocation with the strongest global device support. n38 is a strict subset of n41, and n7, while widely deployed, does not offer the same contiguous bandwidth advantages for modern TDD-based 5G deployments.

Notably, Band 2 / n2 is absent, which is unusual given its extensive global deployment. Likewise, n25, the superset of n2, is also missing, despite offering greater flexibility and backward compatibility. This omission is difficult to reconcile with real-world operator deployments.

Supplementary downlink bands such as n75 and n76 add little practical value. Device support is limited, and these bands are rarely deployed as primary spectrum layers. Their inclusion does not materially change network performance or economics.

Finally, n79 sits at the upper edge of mid-band spectrum, with relatively weak device support and limited adoption outside a small number of markets. Its practical relevance is therefore constrained.

## 24. Annex: Full List of 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?
- 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?
- Question 3. Which 5G New Radio spectrum bands should be allocated for 5G in Anguilla and Why?
- 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.
- Question 5. What minimum spectrum block sizes should be available for assignment?
- Question 6. What views do respondents have about future spectrum 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?
- Question 8. Should there be spectrum caps where demand > supply?
- Question 9. What should be the pricing of the 3.5 GHz band? What is the justification for your proposals?

**1.** 5G NR TDD spectrum should be assigned and operated on a synchronized basis. Synchronization is a well-established best practice for TDD networks, particularly in mid-band spectrum, as it materially reduces inter-operator interference, improves spectral efficiency, and simplifies network coordination. An unsynchronized approach would introduce unnecessary complexity and risk without providing any tangible technical or economic benefit.

**2.** We do not believe there is any credible risk of harmful interference arising from the use of mobile services in the 3,400–3,800 MHz band in Anguilla. From a geographic standpoint, Anguilla's location does not present unique satellite coexistence challenges. From a technical standpoint, modern VSAT systems operating in adjacent bands employ highly selective filtering, and legacy C-band satellite receive installations have largely been decommissioned. In addition, many users have transitioned to IPTV solutions or alternative frequency ranges. As such, the risk of harmful interference is minimal and manageable using well-understood coordination practices.

**3.** All globally available and commercially relevant 5G NR bands should be enabled for use in Anguilla, with the exception of FR2 (mmWave). FR2 bands have limited practical utility due to severe propagation constraints, high deployment cost,

and limited real-world use cases outside of ultra-dense environments. Enabling the full suite of FR1 bands ensures maximum flexibility, promotes competition, and aligns Anguilla with global best practices.

4. All available bands should be introduced simultaneously rather than through a staged process. Staggered introductions create artificial scarcity, delay investment, and constrain innovation. Making spectrum available at once allows operators to plan holistically, deploy efficiently, and support economic growth through ubiquitous connectivity.
5. Minimum spectrum block sizes should be structured to support efficient 5G deployment. Low-band spectrum should be available in minimum 5 MHz blocks. Mid-band spectrum below 3.3 GHz should be made available in 20 MHz contiguous blocks. Spectrum at and above 3.3 GHz should be made available in 100 MHz contiguous blocks. These block sizes align with 5G NR technical requirements and enable meaningful throughput without reliance on excessive carrier aggregation.
6. If Anguilla enables the full range of globally available FR1 spectrum today, future spectrum demand is likely to be limited for the foreseeable future. Spectrum above approximately 6–7 GHz provides diminishing practical returns due to propagation constraints and deployment economics, and should not be relied upon as a primary growth vector.
7. We support a beauty contest or comparative selection process where demand exceeds supply. This approach ensures spectrum is awarded to operators with credible deployment plans, technical capability, and long-term commitment. Alternative mechanisms, particularly revenue-maximizing auctions, risk misallocating spectrum and diverting capital away from network investment, ultimately to the detriment of consumers and taxpayers.
8. Spectrum caps should be applied where demand exceeds supply. Reasonable caps promote competition, prevent excessive concentration, and ensure efficient use of scarce spectrum resources.
9. Pricing for the 3.5 GHz band should be set below current spectrum pricing levels in Anguilla. While the band offers high capacity, its propagation characteristics are significantly inferior to low-band spectrum, requiring denser infrastructure and higher deployment costs. Pricing should reflect this reality to encourage investment and accelerate network rollout.

We thank the Anguilla Public Utilities Commission for the opportunity to participate in this consultation and for its constructive and forward-looking engagement on 5G spectrum policy. We commend the Commission's focus on enabling economic development, investment, and innovation through next-generation connectivity, and wish the Commission continued success in advancing a regulatory framework that supports sustainable growth and long-term national benefit for Anguilla.

Regards,

A handwritten signature in black ink, reading "Zlatko Zahirović". The signature is written in a cursive, flowing style.

Zlatko Zahirovic  
Chief Technology Officer  
Paradise Mobile Ltd.