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**Public consultation concerning The Swedish National Post and Telecom Agency Draft Regulations on licences to use radio transmitters in the 2500–2690 MHz band**

**WiMAX Forum™ Response**

The WiMAX Forum™<sup>1</sup> welcomes the opportunity to provide its views and comments concerning the issues for the 2.6GHz band identified in the above public consultation document.

The WiMAX Forum is an industry-led, non-profit corporation formed to promote and certify the compatibility and interoperability of broadband wireless products using the IEEE 802.16 and ETSI HiperMAN wireless MAN specifications. The WiMAX Forum's goal is to accelerate the introduction of these devices into the marketplace. WiMAX Forum Certified™ products will be fully interoperable and support Metropolitan Broadband Fixed, Portable and Mobile Applications. For more information about the WiMAX Forum and its activities, please visit [www.WiMAXForum.org](http://www.WiMAXForum.org). WiMAX Forum™ and WiMAX Forum Certified™ are registered trademarks of the WiMAX Forum™.

The WiMAX Forum respectfully submits the comments in Annex 1 with regard to the consultation document identified above.

Yours Sincerely

Tim Hewitt  
WiMAX Forum  
Chair - Regulatory Working Group

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## **Annex 1**

### **Public consultation concerning The Swedish National Post and Telecom Agency Draft Regulations on licences to use radio transmitters in the 2500–2690 MHz band**

#### **WiMAX Forum comments:**

1) The WiMAX Forum supports the award of the 2500 – 2 690 MHz spectrum at the earliest opportunity and is pleased to see that the PTS is progressing well with this procedure.

2) As the WiMAX Forum has stated previously it considers this range of frequencies a key global band for mobile WiMAX and believes there will be strong demand for IMT-2000 OFDMA TDD WMAN operation in this band. The WiMAX Forum has also previously highlighted to PTS the emphasis on TDD techniques for the WiMAX Certification profiles identified for this frequency range<sup>2</sup>.

3) Regarding section 2.1 (Licence Conditions) in the invitation to apply for licences, the WiMAX Forum is disappointed to note that PTS has decided to continue with fixed partitioning of the band for FDD and TDD techniques which in effect limits the number of TDD licences possible to one. The WiMAX Forum recognises the possibility for limited flexibility to amend FDD licence conditions for TDD use but notes this can only happen if all the FDD licence winners wish to deploy TDD systems. Given the technology choices becoming available for this band the WiMAX Forum does not believe this situation is very likely to occur.

Therefore despite the technology neutral ambitions in the award, the WiMAX Forum believes that the opportunity for Sweden to experience the benefits of new market-ready, IP-based mobile data services may well become artificially constrained.

**WiMAX Forum Request:** Therefore the WiMAX Forum maintains the request that PTS should consider greater flexibility to allow TDD operation outside the range 2570-2620 MHz if demand exists.

4) Concerning the Technical conditions in Appendix 1.

The WiMAX Forum notes that the ECC WG-SE project team SE42 is currently developing Block Edge Mask proposals that may be considered as technical measures in wireless access licences. The WiMAX Forum hopes that the Swedish licence conditions will be consistent with those developed with a European perspective.

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2 Interest survey and consultation regarding licences in the frequency bands 1900–1905 and 2500–2690 MHz; WiMAX Forum Response – 2nd May 2007