

Inquam Broadband GmbH
Adolf-Grimme-Allee 3 • D-50829 Köln

Autoridade Nacional de
Comunicações (ANACOM)

04.12.2007

Send by email to consultabwa@anacom.pt.

Michael Kleine-Finke

michael.kleinefinke@
inquam-broadband.de

**Public Consultation in Portugal "Limitation of frequency usage rights
reserved for BWA", Consultation launched on 06. Nov. 2007**

Inquam Broadband GmbH
Adolf-Grimme-Allee 3
D-50829 Köln
Fon: +49 (0) 221/ 5000-259
Fax: +49 (0) 221/ 5000-260

Dear Sir or Madam,

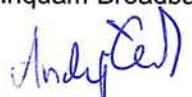
Inquam Broadband GmbH intends to build and operate Broadband Wireless Access (BWA) networks throughout Europe. Therefore, Inquam Broadband welcomes the opportunity to provide its views and comments to ANACOM concerning the "Limitation of frequency usage rights reserved for BWA".

Inquam Broadband GmbH is 100% owned by US based company NextWave Wireless and is not affiliated with any Portuguese market player. NextWave develops wireless broadband and wireless multimedia products, technologies and services for mobile device and network infrastructure manufacturers and for wireless service operators.

We ask ANACOM to accept our comments in English. Inquam Broadband is willing to provide a Portuguese translation if required.

We hope that our responses provide a helpful contribution for your further proceedings. Please feel free to contact me either by phone at +49 221 5000-201 or by email andrzej.cwik@inquam-broadband.de with any questions regarding the above.

Kind regards,
Inquam Broadband GmbH



Dr. Andrzej Cwik
CTO

Attachment
Inquam Broadband Responses

Inquam Broadband Responses

Inquam Broadband highly welcomes that ANACOM will award spectrum in the 3.5 GHz and 3.7 GHz band on a technical and service neutral approach. Given, that this includes also mobility, this allows potential operators to deploy advanced mobile network to offer valuable broadband services using e.g. Mobile WiMAX based on IEEE802.16e from the very beginning. According to various announcements of vendors but also of WiMAX Forum, such systems are expected to be commercially available as of H1/2008.

Inquam Broadband appreciates that ANACOM fully adopts ECC/DEC/(07)02 and just applying a minimum set of technical parameters. From there, Inquam Broadband assumes that operators have the freedom to deploy either a FDD or TDD network. In any case, operators should be able to coordinate technical parameters between themselves and to deviate from technical limits after coordinating with ANACOM accordingly and with ANACOM's approval.

Furthermore, Inquam Broadband supports ANACOM's approach to award the spectrum by auction which is a very transparent and fair allocation procedure for awarding spectrum.

Inquam Broadband also welcomes ANACOM's approach to encourage and facilitate new market entrants by excluding those undertakings already having significant spectrum holdings or having significant market share in the broadband market in the first phase. This will stimulate infrastructure-based as well as service-based competition for the benefit of the customer.

However, Inquam Broadband recommends awarding the licences at least on a 15 year duration term, but prefers rather a 20-year-period. Furthermore the awarded spectrum or parts of it should be fully tradable, which shall include spectrum exchange between operators.

We hope that our responses provide a helpful contribution for your further proceedings.