



July 10, 2007

Mr. David Archbold
Information and Communications Technology Authority
3rd Floor, Allista Towers
85 North Sound Road
Grand Cayman

Dear Sir,

RE: CD2007-1, POLICY FOR THE ALLOCATION OF SPECTRUM

Hurley's Entertainment is pleased to offer its comments in respect of questions raised in the above captioned public consultation document.

1. BACKGROUND, 5.8 GHZ BAND

The 5.8 GHz band is part of a larger group of radio bands allocated by the ITU as Industrial, Scientific and Medical (ISM). The ISM bands are defined by the ITU in the Radio Regulations (RR). Because communication devices using the ISM bands must tolerate any interference from ISM equipment, these bands are typically given over to uses intended for unlicensed operation, since unlicensed operation typically needs to be tolerant of interference from other devices anyway. The 5.8 GHz ISM band is designated as 5725-5875 MHz with a centre frequency of 5800 MHz. Radiocommunication services operating within these bands must accept harmful interference, which may be caused by these applications.

2. USE OF THE ISM BANDS

In the Cayman Islands, the 5.8 GHz band is used for a variety of consumer electronics, including cordless telephones. There are also a number of wireless LAN devices operating in the 5.8 GHz band using the IEEE 802.11a standard. New wireless equipment is expected to use the 802.11n standard in the near future. It is noted that the Authority's spectrum allocation policy has differentiated the 5.8 GHz ISM band from the 2.4 GHz ISM band, and does not specifically address the 902-928 MHz ISM band, which is used for a wide variety of consumer electronics in the Cayman Islands.



HURLEY'S ENTERTAINMENT

Z99 • Rooster 101 • Infinity Broadband
PO Box 30110, Grand Cayman KY1-1201 CAYMAN ISLANDS
TEL: +1 345 945 1166 • FAX: +1 345 945-1006



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3. RESPONSE TO QUESTION A

It is our view that all of the aforementioned ISM bands, including 5.8 GHz, be allocated as a Class Licence, or alternatively, designate the ISM spectrum allocations as "Unlicensed". The intended outcome would be to ensure certainty for the consumer market by allowing a wide variety of wireless devices to operate in the popular ISM bands, specifically 902-928 MHz, 2.4 GHz and 5.8 GHz.

4. ALLOCATION OF SPECTRUM AND RESPONSE TO QUESTIONS B, C, D & E

The radio frequency spectrum is first and foremost a public resource. The management of this resource should be a top priority but yet the Authority's policy has put the burden on licensees to sort out interference issues amongst themselves. It is our view that this so-called "good neighbour" policy does not bode well and appears to conflict with the ITU mandate for administrations to properly manage the radio spectrum and take a pro-active position with regard to its management.

In order for our response to include relevant comments on spectrum allocation, it is requested that the Authority set out its spectrum policy. For example, any spectrum that is currently allocated on a non-exclusive basis needs to be defined by service type. Until this process has been completed, it is difficult to comment on spectrum allocation without knowing what the intended service is.

5. RESPONSE TO QUESTIONS F & G

The Authority should make available a Spectrum Map as well as other pertinent information related to spectrum allocation, including but not limited to policies, procedures, Tables of Allocations, and a searchable database of licensees' technical details that can be accessed through the public internet.

Sincerely yours,

Michael Kiron
Technical Operations and Regulatory Affairs



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