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Public Consultation regarding authorisation of frequencies in 3.5 GHz band for fixed wireless access

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To whom it may concern,

Inquam Broadband GmbH following called "Inquam" intends to build and operate Wireless Broadband Access Networks in Europe. Inquam welcomes the opportunity to submit comments to the public consultation on the planned authorisation of 2x14 MHz in the 3.5 GHz band.

Our comments are structured in accordance to the content of the EETT consultation document.

Re 2.1

- The authorisation shall be nationwide.
Inquam understands that the planned coverage obligations are required for regions sparsely covered by alternative broadband services. However, from the business perspective it is necessary to be able to offer modern broadband services everywhere in the country and not exclude certain regions.
- The assigned rights for spectrum usage shall be fully tradable in line with current European developments.

Re 2.2

- Inquam pleads for flexible spectrum usage without unnecessary limitations on wireless services which can be delivered by modern technology.
In accordance with the Mandate of European Commission for a flexible use approach of this frequency band including fixed, nomadic and mobile usage and the already very advanced respective technical studies within SE PT19 JPT BWA has already drafted the ECC decision for the harmonised used of frequencies in 3400-3600 MHz and 3600-3800 MHz bands including mobile use of this spectrum. This decision will be adopted in the next WG SE

meeting in September 2006 subject to completion of the technical work. Therefore Inquam recommends that EETT takes these developments into account and extend the usage of this spectrum to mobile applications already under the planned authorisation.

Re 2.3

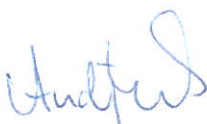
- The assignment period of 10 years is not sufficient from the business perspective.
Inquam requests at least the same duration period as for other authorisations in this frequency band. EETT shall take into account that this authorisation is intended for a newcomer who will enter into an existing market. Therefore these authorisation conditions shall not be worse.

Re 2.4

- Inquam understands that it is planned to assign the spectrum initially by a multi-round auction procedure.
The planned procedure shall be described in detail.

Inquam hopes that these comments are a helpful contribution for your further proceedings regarding the planned auction. Please feel free to contact me at +49 221 5000 201 or andrzej.cwik@inquam-broadband.de with any questions regarding the above.

Kind regards,
Inquam Broadband GmbH



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CTO