

CONSULTATION DOCUMENT

Introduction

1. It has been recently noted, both at European and national level, a growing interest in the potential usage of 900 and 1800 MHz frequencies bands - currently used for second generation radio mobile systems (GSM) - for third generation systems too (3G) and for any other technology equivalent and compatible in accordance with the applicable regulation (the so called *refarming*).
2. The principle of reutilisation of 900 and 1800 MHz bands for third generation mobile systems - upon verification of the actual needs of the market and allowing for any national circumstances to be taken into consideration - has been also assumed in the provisions regarding the use of such bands endorsed at international level by the International Telecommunications Union (ITU). Such a principle has been therefore recalled, at national level, in the National Frequency Allocation Table.
3. The re-use, for the advanced mobile systems, of the frequencies currently in use for the 2G, needs anyway a thorough analysis of the current use of the spectral resources under discussion, in the 900, 1800 and 2100 MHz bands.
4. With reference to a possible re-use of 900 and 1800 MHz bands for the 3G technology, it seems useful to highlight that, both at national and international level, operators' interests seem to converge on 900 MHz frequencies.
5. The 900 MHz band re-use is considered to be favourable due to the wider territory coverage for third generation mobile networks, compared to that reachable in 1800 and 2100 MHz bands. The 900 MHz frequencies band, besides carrying further spectral resources to 3G, shows in fact radio-electric features, in terms of propagation, that make both network development and achievable coverage very interesting if compared to what currently happens in the 2.1 GHz band alone. In fact, the 900 MHz band allows to reach a wider coverage and a better penetration into the buildings. Furthermore, in rural areas the introduction of 3G at 900 MHz would reduce the number of radio base stations needed - the coverage area being equal - compared to 3G operated in the 2.1 GHz band. As a consequence, costs incurred by operators for the 3G mobile networks' development could decrease, and the offer of related services would increase - to the advantage of users and consumers - especially in less densely populated areas, furthermore allowing to limit, in the meanwhile, the environmental impact deriving from the infrastructure development. In urban zones, the higher penetration into the buildings of 900 MHz frequencies, would even ensure mobile networks a good coverage within the building themselves, allowing to maintain the 3G network quality at the same levels as current GSM networks, without expanding the infrastructures.

6. Moreover, it seems to be close enough the availability of network equipment and UMTS terminals in the 900 MHz band. The interest in the 1800 MHz band usage for 3G instead appears to be currently smaller as well as the industrial availability of compatible equipment.

The present situation of frequencies assignment for mobile systems and of the regulatory framework

7. On the 7th October 2003 the Ministry of Communications notified the Authority the subscription of an agreement, hereafter referred to as the “procedural agreement”, under art. 11 of Law no. 241/90, with the public GSM radio-mobile operators, in order to assign the available frequencies in the 900 MHz band. Such an agreement was recalled founded on art. 6 and 7 of Decision no. 286/02/CONS. In particular, art. 7 of the above mentioned Decision prescribes that public GSM operators - save the provisions set out in art. 2 and 5 of the Decision itself - have the possibility to propose plans aimed at the allocations’ reorganization in the 900 MHz band, in order to get a more rational usage of the frequencies themselves.
8. The procedural agreement provided for a division into three phases of the assignment and reorganisation of 900 MHz GSM frequencies plan. The steps following the first one would have been only reached if the Authority had removed the restraint of spectrum cap of nominal 25 MHz GSM at national level, to the total amount of frequencies that each mobile operator can hold, limit provided by Decision no. 286/02/CONS. In case such a condition was not met, the agreement provided for a reserve phase of assignment, the so called “phase 2bis”.
9. Following the procedural agreement, the Ministry authorised the assignment of the frequency band left free from TACS and CT1 - according to what was provided by the Ministry Decree of April the 1st 2004 – as well as reorganising the assignments of 900 MHz band, by means of decrees of October the 20th 2003 and December the 29th 2004. The last of them resulted in the operators realising the so called “phase 2bis” of the procedural agreement.
10. Decision no. 286/02/CONS furthermore provided that, because of the present provision of GSM frequencies assignment to existing GSM operators – widely justified in the premises of the Decision itself - it was necessary to determine a spectrum cap of overall nominal 25 MHz - on a national basis – to frequencies that could be assigned - between 900 and 1800 MHz - on demand and in a non-discriminatory way, to single operators, upon achievement of some efficiency requirement, as stated in art. 2 of the cited Decision.
11. The present frequencies assignment, moreover provisional, shows - following the weighting principle provided for by Decision no. 286/02/CONS - a slight overrunning of some channels by a single operator, compared with the cap of 25 MHz. However, the possibility of such an overrun had already been reviewed by the Ministry and the Authority. With the note of July the 29th 2003, in fact, the Ministry requested an opinion to the Authority on the possibility that, given the progressive calendar of TACS and CT1 frequencies liberation, it could be temporarily necessary - due to the delay in any revision of the overall framework of frequencies assignment - to proceed to an assignment plan that would imply a slight exceeding of the national 25 MHz

limit foreseen. The Authority, with the note of September the 12th 2003, provided that, for proved technical reasons, a modest exceeding of the cap that had been set could be feasible, as long as temporarily and provided that such a situation would not constitute any right or expectation for the use of the exceeding band after December the 31st 2005 (which was the date for the final suspension of the frequencies' usage for the TACS service) or whenever the above mentioned technical reasons had ceased.

12. In addition, it has to be pointed out that such an allocation is provisional and justifiable on the basis of the technical needs for a re-allotment and for a first rationalisation of the channels assigned to the three existing GSM operators. Furthermore, efficiency reasons, linked to the overall usage of frequencies, would have made unjustified any lack of use of such a small number of channels.
13. Following the notification of the procedural agreement, under art. 3 of Decision no. 286/02/CONS and art. 29, paragraph 1, lett. b) of the Code, by means of Decision no. 54/04/CONS, the Authority started up a public consultation on the definition of the procedures to be followed in the assignment of the rights of use of the available frequencies, intended for the public GSM service, to the existing operators and any possible new operators. 12 companies have sent their contributions for this consultation (WIND, TIM, H3G, Vodafone, Tele2, Trans World Communications Italia, ComasmoTel and Iride (jointly), ReteItaly, Startel, Spal Telecommunications, Telecom Italia and the Association AIIP). In particular, WIND, TIM, H3G, Vodafone, Trans World Communications Italia, ComasmoTel, Iride, ReteItaly, Startel and the Association AIIP, also requested to illustrate their response document in the course of a hearing.
14. On the conclusion of the above mentioned public consultation, the Authority noticed there was not enough interest in the entry of an additional GSM operator with the base of its spectrum in the 1800 MHz band, the only one then available, with sufficient width, for the offer of services comparable to those of the incumbent operators, and who would proceed to the realization of a self-owned network.
15. In particular, it has been highlighted that the infrastructural development of a new GSM network, with subsequent considerable investment in a – already by then - completely mature technology, in a context in which already appeared with initial success the new technologies that, over time, should replace GSM itself, would have been at great risk of failure. In such conditions, in fact, investments would have been addressed to a network based on a technology to be considerable almost obsolete, therefore sacrificing potential developments in more promising and efficient technologies. On the other hand, the commercial success of an eventual fourth national GSM operator would have been highly doubtful, taking into consideration that some time before, a fourth national GSM operator (without UMTS license) had closed down – BLU - which had at its disposal a self-owned GSM network sufficiently extended, with coverage duties voluntarily taken within the tender where it was selected and a considerable number of active clients. No concrete manifestation of interest in the development of such a national network were noticed, without the claim for the introduction of significant asymmetrical measures in charge to the other operators - who should have accompanied and fostered the development of such a new operator - and the request for the absence of any minimum coverage obligation. In particular, the development of a possible new network would have addressed only the most profitable areas; therefore such a potential new GSM operator would have been

marked out by its being substantially a virtual operator, taking also into consideration the Italian market saturation and the absence at date of significant capacity problems on the existent networks, ensured by the band assigned to the existent operators under the Decision of year 2002 and by the start up and development of 3G services in the 2.1 GHz band.

16. On the other hand, the Authority verified - with the above mentioned public consultation – the lack of any convergence amongst mobile operators on the modalities of assignment of the residual 900 MHz band and on the possibility to rationalize the 900 MHz band, and therefore has considered that the most feasible solution, both for the balance of the market and the service development, would be the *status quo*.
17. Furthermore, at European level, the first discussions on the perspective *refarming* of the band and its flexible usage were just started and that was confirming – taking also into consideration that both the allocations following Decision no. 286/02/CONS and the start up and development of third generation mobile services had allowed a significant capacity resource to the operators – that the new band assignment, under the regulatory framework then in force, was not a priority.
18. The 900 MHz frequency band is made by two 35 MHz blocks divided by a 45 MHz duplex separation, corresponding to the 880-915 MHz and 925-960 MHz sub-bands.
19. The 1800 MHz band is made by two 75 MHz frequency blocks, divided by a 95 MHz duplex separation, corresponding to the 1710-1785 MHz and 1805-1880 MHz sub-bands. The first paired 5 MHz of the above mentioned band are reserved, by the National Frequency Allocation Table, to the Defence, so that the band available to the mobile systems results in 70 MHz, in accordance with the National Frequency Allocation Table.
20. The assignment plan of 900 MHz and 1800 MHz band provides for a division among three GSM operators (Telecom Italia, Vodafone, Wind). In particular, the 900 MHz assignments provide in turn for a division between big cities areas and rest of the territory, which leads to a non-efficient usage of the spectrum, and for the breaking up of the band among operators into uneven blocks. Such a situation comes from a design of the assignment plans which took place over time starting from the first '90s, in order to face up to the technological developments and the growing demand of the market in mobile communication services and on the basis of rationed availability.
21. Current total frequency assignment of public operators are reported below. For the computation of the national band, in cases where the same frequencies are allocated to different operators in different parts of the national territory, it is possible to use the provisions of art. 1, paragraph 4 of Decision no. 286/02/CONS:

Operator	Band allocated at 900 MHz and 1800 MHz, expressed in paired MHz ¹	
	900 MHz Band	1800 MHz Band

¹ The 16 biggest cities are the territorial and suburban areas of: Milano, Roma, Napoli, Torino, Palermo, Padova, Genova, Bologna, Firenze, Bari, Cagliari, Catania, Messina, Taranto, Trieste, Verona. The population in such areas constitutes about 18% of the national total amount.

TELECOM ITALIA	16 big cities: 12.2 MHz Rest of the national territory: 10.2 MHz	15 MHz
VODAFONE	16 big cities: 10.2 MHz Rest of the national territory: 9.0 MHz	15 MHz
WIND	16 big cities: 4.8 MHz Rest of the national territory: 7.8 MHz	16 big cities: 20 MHz Rest of the national territory: 15 MHz
Guard-Channels	1.6 MHz	
AVAILABLE	6.4 MHz	All national territory: 20 MHz In addition, over all national territory except 16 big cities: 5 MHz
TOTAL	35 MHz	70 MHz

22. The current situation of assignment in Italy, with reference to the band IMT-2000/UMTS at 2.1 GHz (the so called “core-band”), is also reported for the subsequent considerations.

Frequencies band	Usage	Assignment
1900-1920 MHz (20 MHz)	UMTS TDD	H3G (5 MHz) VODAFONE (5 MHz) TELECOM ITALIA (5 MHz) 5 MHz assigned to IPSE2000 now revoked
1920-1980 MHz 2110-2170 MHz (2x60 MHz)	UMTS FDD	TELECOM ITALIA (2x10 MHz) WIND (2x10 MHz) H3G (2x15 MHz) VODAFONE (2x10 MHz). 3 blocks of 2x5 MHz assigned to IPSE2000 now revoked
2010-2020 MHz (10 MHz)	free	
2020-2025 MHz (5 MHz)	UMTS TDD	1 block of 5 MHz assigned to WIND

23 In January 2006 the Ministry of Communications provided for the formal withdrawal of the license of the fifth UMTS operator, namely IPSE 2000, with an endowment in the 2.1 GHz range (specifically 15 MHz, paired for the FDD use and 15 MHz unpaired for TDD use). This proceeding is still subject to a second degree appeal in the administrative justice courts.

24 At the European Community level, the course of action to start the procedure to withdraw the 1987 GSM Directive, that makes the use of the 900 MHz (excluding the so

called “extended band” or ex TACS) and of the 1800 MHz bands tied with the specific GSM technology, was initiated. The mentioned Directive is the “Council Directive 87/372/CEE of June 25th 1987 on the frequency bands to be assigned for the coordinated introduction of the pan-European digital cellular public service for terrestrial radio mobile telephony in the Community.” It is foreseen that the new Directive, that ratifies the withdrawal of the GSM Directive, will enter in force between this year and the beginning of next year.

- 25 Specifically, the Commission, in May 2007, has obtained the favourable opinion of the Radio Spectrum Committee, in order to issue a decision regarding the flexible use of the bands at 900 and 1800 MHz, which would be therefore open also to UMTS systems or other possible equivalent and compatible technologies. The mentioned decision is to date titled, “Decision on the harmonization of the 900 MHz and 1800 MHz frequency bands for terrestrial systems capable of providing pan-European electronic communications services in the Community”. Such a decision should enter in force at the same time of the withdrawal of the GSM Directive
- 26 Both decisions are supported by the following compatibility studies made by CEPT: ECC Report 096 “Compatibility between UMTS900/1800 and systems operating in adjacent bands” and ECC Report 082 “Compatibility study for UMTS operating within the GSM 900 and GSM 1800 frequency bands”.

900 MHz frequency bands: redefinition of the regulation framework

- 27 The present system of assignment in the 900 MHz band is inefficient because it is conducive to an excessive fragmentation of the channels among the assignees, and at the territory level, where it entails a split among complementary geographical zones, that foresees “guard areas”, where the related frequencies cannot be utilized.
- 28 Furthermore the present assignment plan is not organized on the basis of 5 MHz blocks, hence making it necessary, in order to carry out an eventual refarming plan towards technologies that make use of blocks of the aforementioned size, to modify the current assignments.
- 29 A refarming plan could therefore, by and large, involve a slight reduction of the band assigned to the existing GSM operators. This is unavoidable, due to the fact that the use with 3G systems requires a band of multiples of 5 MHz. Such a reduction would be fully compensated by the increased efficiency resulting from the use of systems such as the 3G ones, and by the possibility of developing such systems in a band with characteristics of propagation that are more advantageous than in other bands used for the 3G technology services. In particular, a slight reduction of the GSM channels will be widely compensated by the possibility of using, in a short period, the 3G technologies that allow a greater efficiency in terms of number of serviced users, the possibility of using guard bands which cannot presently be dedicated to the services, and by the recover for the service of the guard areas between the major cities and the rest of the national territory.
- 30 On the other hand some of the present assignments, that fall under the regulations set forth by Decision no. 286/02/CONS are temporary, therefore the Authority believes that GSM assignments needs must be re-examined in the context of a process that should

privilege the introduction of advanced technologies, that, as shown, allow a more efficient use of the spectrum.

- 31 As far as the development of 900 MHz spectrum assignments plans is concerned, the Authority has identified two possible solutions. The first entails the possibility of promoting, with the agreement of all the existing operators, a reallocation and refarming plan within a short time period (option A), thus allowing , while safeguarding the needs of GSM only end users and providing for the transitional technical requirements, the use of 3G systems in the band, in a relatively short time span, while the second option, to be pursued should the first be unfeasible, entails the fact that the overall refarming should be executed at the latest at the expiration of the licenses of the current operators and before the possible renewal (option B). The existing GSM licenses have a deadline between the year 2015 and 2018. If this second option is pursued, it would be necessary, in a relatively short time, to initiate a procedure to recover the GSM channels temporarily assigned, in order to start the refarming on at least some portions of the 900 MHz spectrum.
- 32 A possible working hypothesis for an assignment plan, in case the aforementioned option A can be carried out, entails the target channelling of the 900 MHz band in 5 MHz blocks on a national basis, and the assignment of multiples of 5 MHz, and assumes that no operator can obtain more than 2 blocks, so that a balanced development of the competition can be achieved. Under this hypothesis, it is therefore necessary to foresee a slight readjustment of the nominal band assigned to each operator, keeping also in consideration what has already been provided for under Decision no. 286/02/CONS, which allows the present GSM operators to reach, under specific conditions, a maximum of nominal 25 MHz, in 900 and 1800 MHz bands.
- 33 Under the conditions described in the hypothesis A it should therefore be possible the identification of two 5 MHz blocks to be assigned on the basis of a competitive selection, with a priority for those operators that need additional resources in order to achieve a renewed equilibrium of the assigned band to the mobile operators. Such blocks could be used for 3G type technologies, eventually taking into consideration the possibility of introducing roaming obligations with frequency sharing for one or both blocks.
- 34 A slight reduction of the band of the existing GSM operators would occur voluntarily, and at the expense of such operators. No financial compensation is foreseen.
- 35 As far as the maximum existing limit for the band of the present GSM operators is concerned, the Authority believes that, following the aforementioned re-assignment and flexible use plan, such a limit, where necessary, could be removed. The 25 MHz cap was set as an indicative limit that could be subject to future revisions, and was also set at that time to avoid the hoarding of frequencies in few subjects on the basis of reserved assignment procedures.
- 36 Where an agreement that will consent the realization of option A cannot be reached, the Authority believes first that there may be a need to re-examine the existing GSM assignment conditions, in particular the temporary assignments pursuant to the Decision no. 286/02/CONS. This should be done also in light of the actual situation of GSM customer base that has occurred in the meantime, with the aim of freeing portions of frequencies at 900 MHz reusable in the short time for 3G type systems.

- 37 Such blocks, of which one is certainly identifiable in the 900 MHz band currently free, equal to gross 6.8 MHz, as previously described, could be assigned in a short time with competitive selection procedures possibly to be prioritized for operators with limited assignments in 900 MHz band or without such a band, for the immediate use with 3G type technologies.
- 38 Under the same option B, the overall 900 MHz band refarming plan should be re-examined within the expiration of the current licenses of existing operators and at the latest carried out at the time of an eventual renewal. In the meantime, no change in the use of the already assigned band should be authorized.
- 39 The refarming process activated, in either hypothesis, would not change the duration of the licenses of the authorized operators. However, when the final operational situation has been reached, with the refarming completely established, the present GSM licenses could be converted to UMTS and extended until they are aligned to the present UMTS licenses, in order to have a unique homogenous deadline.

Consultation questions

1.1 Can the proposals for the target assignment and for refarming of the 900 MHz band for mobile systems, be agreed upon, under the 2 described options ?

1.2 Are the conditions set forth in the realization of the described assignments deemed adequate?

1.3 What could be the time frame to realize the new assignment plan, both under the option A and the option B ?

Frequency band at 1800 MHz: redefinition of the regulation framework

- 40 For the 1800 MHz band it is considered reasonable to proceed to assess the possibility to confirm the temporary allocation of the 5 MHz block to Wind, that now covers the 16 major cities, and extend it to national level. A possible permanent assignment would address the need of Wind to develop its services and may be based on decision n. 286/02/CONS. Such an assignment would allow a more organized and efficient use of the spectrum.
- 41 As to the rest of the non-assigned 1800 MHz band (2x20 MHz), which the current National Frequency Allocation Table foresees to be allocated to public mobile systems, 2 blocks of 2x5 MHz could be initially reserved to operators without 1800 MHz frequencies, including possible new entrants, for the use with 3G technology. This measure is subject to market demand and the conditions foreseen in the Table. The rest of the band could be kept as a “guard band buffer” to the end of realising the temporary *refarming* plan, and later aimed at assignment in the light of the developments in the market occurred in the meantime.

- 42 The 1800 MHz band to be assigned requires a previous liberation of frequencies by the Defence and is subject to the conditions indicated in the NFAT.
- 43 For already allocated 1800 MHz band the refarming plan towards 3G technologies should be evaluated on the basis of market demand and GSM users' needs.

Consultation questions

2.1 Do you agree on the proposals for the assignment of 1800 MHz frequency band for mobile systems?

2.2 Do you deem the conditions foreseen for the execution of the above described assignments to be adequate?

2.3 In particular, which could be the time line for the assignment of the further band available? Which could be the time frame for the availability of 3G type equipment?

2.4 How could a *refarming* plan be organised for the assigned band ?

Technical conditions for the refarming of 900 and 1800 MHz bands

- 44 As to the technical conditions of the execution of refarming, and hence the possibility of regulating the transition from GSM to UMTS or other eventual equivalent and compatible technologies according to the regulation in force, the following considerations should be drawn. First a reference should be made to the Report 82 of CEPT, according to which coexistence of UMTS and GSM is possible as long as they respect the coordination regulation. Since the distance between a UMTS carrier and the nearest GSM one is recommended to be at least 2.8 MHz, consequently, the neighbouring GSM operator could face limitations in using at least one channel when there is no adequate coordination or the introduction of a guard band.
- 45 It is reasonable to consider that operators that can use only 5 MHz nominal in the 900 MHz band for the use of UMTS could not use their carrier without an agreement with the neighbouring GSM operator. For the use of 1800 MHz band by UMTS operators however, despite facing the same drawbacks as for 900 MHz band, the introduction of UMTS could be simplified because the overall band is wider and already organised in 5 MHz blocks channelling.
- 46 It is reasonable that in the considered scenarios for the assignments of 900 and 1800 MHz bands the operators interested would devise an adequate plan for usage and migration from the actual to final operational situation.
- 47 The UMTS operator at 900 and 1800 MHz and the neighbouring GSM operator should negotiate in good faith the deployment of the UMTS network in order to minimize the need for protection. A GSM operator which intends to operate a UMTS carrier while keeping other GSM channels should carry out such a refarming by using frequencies next to the UMTS operator as far as possible.

- 48 The costs of *refarming* have to be sustained by the involved operators and no form of financial compensation is foreseen.
- 49 The refarming plan from GSM to UMTS must guarantee the protection of users, in particular those still operating GSM only devices. The Authority reserves the right to examine and approve the foreseen plan.

Consultation questions

3.1 Do you agree on the technical proposal for the execution of *refarming* in the 900 and 1800 MHz bands?

3.2 Which conditions should be introduced in order for a change in technology by GSM operators to be authorised? In particular, how could consumer protection be assessed?

3.3 The EC draft decision under adoption foresees the flexible use of 900 and 1800 MHz bands for pan-European compatible electronic communication systems, one of which currently is UMTS. Do you intend to propose the introduction of other technologies? How ?

Re-assignment of frequency blocks in the 2.1 GHz band

- 50 A parameter that can influence also the future decisions is the possibility of reassignment, to operators including a prospective new entrant, of frequency blocks in the 2.1 GHz band returned under the State availability given the exit of IPSE2000 from the market. It is assumed that the use of this band will occur with IMT2000 family systems, as currently foreseen by the NFAT, save possible future amendments.
- 51 It could therefore be proposed a scenario which foresees the availability of 3 blocks of 2x5 MHz of paired spectrum and the launch of a competitive selection procedure, where 2 of the 3 blocks would be reserved in first instance to new entrants, which could also compete for the free 1800 MHz blocks. The third block at 2.1 GHz would be contended also by existing mobile operators.
- 52 For an eventual new entrant coverage obligations similar to those imposed during the last UMTS selection could be introduced. The duration of the licence could be aligned with those of the other UMTS operators in order to homogenize the system of expiry and eventual renewal of licences.
- 53 As to the TDD band included in the UMTS core band, it should be taken into account the fact that the development of technologies, contrary to expectations, has not led to the effective use of this band, that is currently unused. It can be then proposed an assignment solution that foresees a swap between Wind's TDD block and the TDD block included in the ex IPSE2000 licence, as soon as this solution is feasible. Such a swap would have advantages both for Wind, as the interference conditions of the ex IPSE block are generally considered better, and for the Administration, given that it could have available a continuous and fully free 15 MHz band from 2010 to 2025 MHz. Such a band could be subject to future decisions by the Authority, after assessing there is sufficient interest in the market.

54 Pro-competitive measures in favour of the eventual new UMTS operator could be in line with the provisions of the UMTS licences auction. It would be then foreseeable for the new operator to benefit from roaming on the whole range of GSM frequencies (900 and 1800 MHz), for a period of 5 years starting from the moment when frequencies first become available, in charge to existing GSM operators. The Authority considers that the particular conditions for this obligation could be congruent to the analogous conditions in the mentioned UMTS auction.

Consultation questions

4.1 Do you agree on the proposal to assign the ex IPSE2000 2x15 MHz band at 2.1 GHz in blocks of 2x5 MHz, by further reserving two of them in a first instance to a new entrant, for the offer of 3G services, while making the third one also accessible to existing mobile operators?

4.2. Do you agree on the proposed conditions of assignment ?

4.3 If the respondent is a company or other legal entity that could be considered a new entrant in the public mobile services market, it is kindly asked to attach a non-binding letter (max 2 pages) to express its interest in participating in the above described selection, including also indications regarding the project plan and the financial resources foreseen for its implementation.

4.4 Do you agree on the proposal for the swap of the 5 MHz TDD frequency blocks as described?