

Appendix V: Decisions on Recommendations from the Targeted Stakeholder Consultation

The following summarises the comments and recommendations received from the targeted stakeholders consultation, held on June 23, 2020, on the *Spectrum Plan for the Accommodation of Broadcast Auxiliary Services* (the Spectrum Plan) and the decisions made by the Telecommunications Authority of Trinidad and Tobago (the Authority).

The Authority wishes to express its appreciation to the following stakeholders from the radio and television free-to-air broadcasters for attending the consultation:

- i. Family Focus Limited – Mr. Vince Legere
- ii. Guardian Media Limited – Mr. Anthony Seegobin
- iii. Trinidad & Tobago Publishers & Broadcasters Association (TTPBA) – Richard Purcell
- iv. Trinidad & Tobago Publishers & Broadcasters Association (TTPBA) – George Basanio
- v. Gem Radio Five Limited and C.C.N. Television Limited (One Caribbean Media Group) – Mr. Kester Brown
- vi. Telemedia Limited (97.1), Central Radio Limited (90.5) and Radio News Network Limited (104.1) – Mr. Robin Bansingh

Note: All tabulated comments and recommendations are based on oral submissions from the stakeholders in attendance.

Item	Section	Section Title	Stakeholder	Comments	Recommendations	TATT's Decision
1	1	Executive Summary	Vince Legere (Family Focus Limited)	There is some confusion with the statement which says that broadcasters are not operating in line with the Trinidad and Tobago Frequency Allocation Table (TTFAT) as it relates to STLs. Broadcasters were following the procedure. They were using STL frequencies that were		The statement in the Executive Summary refers to the findings of a spectrum audit conducted in 2011. The initial assignments of STLs to some broadcasters were made by the former Telecommunications Division under the Wireless Telegraphy Ordinance prior to the

Spectrum Plan for the Accommodation of Broadcast Auxiliary Services

Item	Section	Section Title	Stakeholder	Comments	Recommendations	TATT's Decision
				assigned and being invoiced.		<p>establishment of the Authority and the publication of the TTFAT. The spectrum audit conducted in 2011 revealed that these legacy assignments were not aligned with the Authority's TTFAT, 2010 and contemporary frequency bands used by the broadcasting industry.</p> <p>The Executive Summary has been revised accordingly.</p> <p>Since this audit, the Authority has reformed and migrated such assignments to be consistent with the TTFAT and, by extension, this spectrum plan.</p>
2	2	Considerations for the Accommodation of Radio and Television Broadcast Auxiliary Services - Table 2	Vince Legere (Family Focus Limited)	The Television OB links (450 - 451 MHz and 455 - 456 MHz) identified in the table are used for radio broadcasting. Normally, television OB links are assigned in the 2 GHz band.		<p>Section 4.2 has been revised to correctly state the OB/ENG links in the frequency ranges 450 – 451 MHz and 455 – 456 MHz were used for electronic news gathering (ENG) and radio outside broadcasting (ROB) services.</p> <p>These frequency ranges are no longer allocated for the</p>

Spectrum Plan for the Accommodation of Broadcast Auxiliary Services

Item	Section	Section Title	Stakeholder	Comments	Recommendations	TATT's Decision
						<p>provision of ROB services. These ranges were repurposed for land mobile service in 2011. This is consistent with the ITU-R Region 2 allocations.</p> <p>Furthermore, the Authority confirms that the bands allocated for television ENG/OB are the 2 GHz and 2.2 GHz bands.</p>
3	2	Considerations for the Accommodation of Radio and Television Broadcast Auxiliary Services - Table 2	Anthony Seegobin (Guardian Media)	Broadcasters would have invested in OB systems to operate in the 450 MHz band to operate their business on frequencies which were allocated by the Authority. Clarification is needed on whether these operators will now need to be relocated from the band they have been using to operate or whether the Authority will no longer allow new allocations on this band for the purpose previously used.		<p>The Authority has been working with broadcasters to ensure that all non-compliant STL/OB systems migrate to the bands allocated to such systems within this plan.</p> <p>The Authority's audit in 2011 confirmed that only one broadcaster was operating in the 450 MHz band and this broadcaster was given until the start of the new concession, 2016, to commence migration. This migration is currently ongoing.</p> <p>The 450 MHz band was repurposed for the provision of land mobile services.</p>

Spectrum Plan for the Accommodation of Broadcast Auxiliary Services

Item	Section	Section Title	Stakeholder	Comments	Recommendations	TATT's Decision
					<p>The frequencies being used by the operators were allocated by the Authority and an investment would have been made by the operator. Based on the frequencies identified, relocating the operators to a new frequency band will more than likely make the equipment that they would have invested in now defunct. Operators who will be bidding for the BWA spectrum could pay for the relocation of the previous operator as it relates to the equipment and also pay for the relocation as they are the ones that will be receiving the frequencies that are being used by the present operators.</p>	<p>The Authority is mindful that the reallocating of operators to a new frequency band has a financial impact.</p> <p>Section 42(1) and 42(2) of the Act allows the Authority to allocate and reallocate the radiofrequency (RF) spectrum to meet the current and future communications needs of commercial users, as well as the State in respect of matters of national security.</p> <p>Spectrum reallocation is required from time to time as technologies develop and spectrum needs change. This may result in the migration of existing users and this is all part of the processes involved in the efficient and effective spectrum management. The Authority takes into consideration a reasonable timeframe for migration in order to minimise the financial impact on affected spectrum users.</p>

Spectrum Plan for the Accommodation of Broadcast Auxiliary Services

Item	Section	Section Title	Stakeholder	Comments	Recommendations	TATT's Decision
						<p>In the 450 MHz band only one broadcaster needed to migrate. This broadcaster agreed to migrate. Consequently, the Authority did not have to pursue an alternative approach. The 450 MHz band was repurposed for the provision of land mobile services.</p>
4	3	Frequency Assignment Principles	Anthony Seegobin (Guardian Media)	<p>Prior to the TATT, the Ministry of Public Utilities would oversee the allocation of spectrum in Trinidad and Tobago. This ministry was entrusted with the management of the spectrum and they issued licences or authorised the use of frequencies. It seems like TATT is not recognising these frequencies that were assigned under the previous regulating body.</p>	<p>Further discussion is necessary to bring some clarity on this issue. Although there are missing records, operators have been using frequencies and spectrums that were previously assigned by the Ministry of Public Utilities.</p>	<p>The Authority continued to recognise all licences issued by the former Telecommunications Division until their expiration. Subsequent to this, licences that complied with the TTFAT were renewed by the Authority. However, licences that did not comply with the TTFAT were migrated into the respective frequency bands, where necessary, in collaboration with the affected licensees.</p> <p>The Authority confirms that it collaborated with broadcasters to regularise all BAS systems in accordance with the frequency bands identified in this spectrum plan.</p>

Spectrum Plan for the Accommodation of Broadcast Auxiliary Services

Item	Section	Section Title	Stakeholder	Comments	Recommendations	TATT's Decision
						<p>In certain instances, the Authority has also allowed the continued use of frequency bands. For example, the 2 GHz band for television ENG/OB, is currently also used by existing licensees for television STL. This shall be permitted by the Authority until the reallocated use is required. Sufficient notice and consultation will be undertaken should reallocation become necessary.</p>