

Appendix I: Decisions on Recommendations (DORs) Matrix from Single Round of Public Consultation on the *Trinidad and Tobago Frequency Allocation Table*

The following summarises the comments and recommendations received from the single round of public consultation on the *Trinidad and Tobago Frequency Allocation Table* (the TTFAT), which took place from 3rd February to 14th March 2025. The decisions made by the Telecommunications Authority of Trinidad and Tobago (the Authority) have been incorporated in the approved version (ver. 4.0) of the TTFAT, where applicable. The Authority wishes to thank the following stakeholders for all comments and recommendations received:

- 1. Digicel (Trinidad & Tobago) Limited (Digicel)
- 2. Kuiper Systems LLC
- 3. Telecommunications Services of Trinidad and Tobago (TSTT) Limited

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1	Digicel	General	Digicel (Trinidad & Tobago) Limited (“Digicel”) wishes to thank the Authority for the opportunity to provide its feedback on this consultation document. Please note that the views expressed herein are not exhaustive. Failure to address any issue in this response does not in any way indicate acceptance, agreement or relinquishing of Digicel’s rights.		The Authority acknowledges Digicel’s appreciation for the opportunity to comment on the <i>Trinidad and Tobago Frequency Allocation Table</i> (TTFAT) during this single round of public consultation and notes its position in relation to its rights.
2	Digicel	Section 3 Trinidad and Tobago Frequency Allocation Table (TTFAT) (Page 45) 942 - 960 MHz	Digicel notes that these ranges are being used by a neighbouring country for Mobile.	Digicel recommends that the Authority follow the ITU allocations and reserve this range for Mobile.	The Authority notes Digicel’s recommendation to follow the ITU Region 2 allocation of the frequency range 942–960 MHz to mobile service on a primary basis. Digicel is advised that the frequency range 942–960 MHz is allocated to fixed service on a primary basis, in response to specific domestic spectrum requirements and in keeping with ITU Region 2 allocation. As such, the <i>Spectrum Plan for the Accommodation of Radio and Television Broadcast Auxiliary Services</i> (TATT 2020) was developed to provide usable spectrum for radio broadcasting studio-to-transmitter links, with all other uses to be considered secondary. This is reflected in footnote TT22. The 942–960 MHz spectrum is not available to be allocated for mobile services, since the 902–928 MHz band has been identified for industrial, scientific and medical (ISM) applications.

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3	Digicel	Section 3 Trinidad and Tobago Frequency Allocation Table (TTFAT) (Page 48) 1535-1559 MHz	Digicel notes that this range is part of 5G N24 (Upper L-band).	Digicel recommends that this allocation be reserved for Mobile.	The Authority is aware that the frequency range 1535–1559 MHz is part of the fifth generation (5G) New Radio (NR) band n24 (1525–1559/1626.5–1660 MHz). Digicel is reminded that the frequency range 1535–1559 MHz is allocated to MOBILE-SATELLITE (space-to-Earth) on a primary basis for International Telecommunication Union (ITU) Region 2 administrations. Any change to this allocation will depend on relevant studies and the outcomes of the ITU World Radiocommunication Conference 2027 (WRC-27). The Authority shall follow the development of the 5G NR band n24 before supporting any change to its allocation.
4	Digicel	Section 3 Trinidad and Tobago Frequency Allocation Table (TTFAT) (Page 49) 1626.5-1660 MHz	Digicel notes that this range is part of 5G N24 (Upper L-band).	Digicel recommends that this allocation be reserved for Mobile.	Digicel is advised that the frequency range 1626.5–1660 MHz is allocated to MOBILE-SATELLITE (space-to-Earth) on a primary basis for ITU Region 2 administrations. Any change to this allocation will depend on relevant studies and the outcomes of WRCs. The Authority shall follow the development of 5G NR band n24 before supporting any change to its allocation.
5	Digicel	Section 3 Trinidad and Tobago Frequency Allocation Table (TTFAT) (Pages 52 and 53) 2110-2120, 2120-2160, 2160-2170, 2170-2200 MHz	Digicel notes that these spectrum ranges are part of the Mobile AWS range.	Digicel recommends removing Space Research and that these allocations be reserved only for Mobile and Fixed.	The Authority acknowledges that the frequency ranges 2110–2120, 2120–2160, 2160–2170 and 2170–2200 MHz are part of the mobile advanced wireless services (AWS) spectrum. Notwithstanding that, Digicel is reminded of policy statement #6 in the Authority's <i>Spectrum Management Framework</i> which states, "Spectrum use shall be harmonised, as far as practicable, with international and regional allocations and standards, to generate additional benefits in terms of access and economies of scale." As such, Digicel is informed that these ranges have been internationally harmonised for all ITU regions with space research allocated on a co-primary basis with fixed and mobile in the 2110–2120 MHz band. Given the above, the Authority advises that the removal of space research is not warranted at this time and shall follow

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					the development of these ranges internationally and regionally.
6	Kuiper Systems LLC	Section 3 Trinidad and Tobago Frequency Allocation Table (TTFAT)	Amazon supports the Telecommunications Authority of Trinidad and Tobago (TATT's) proposal to align the allocation of the 17.3-17.7 GHz band (the 17 GHz band) in Trinidad and Tobago with the allocation in ITU Region 2, to include FSS space-to-Earth communications in this band. Amazon commends TATT for its efforts to harmonize the allocation in the 17 GHz band consistent with the outcomes of the 2023 World Radiocommunication Conference (WRC-23). Amazon further supports TATT's proposal to adopt ITU Footnote 5.517B to allocate the 17.7-18.6 GHz, 18.8-19.3 GHz, 19.7-20.2 GHz (space-to-Earth), and 27.5-29.1 GHz and 29.5-30 GHz (Earth-to-space) frequency bands for use by aeronautical and maritime earth stations in motion ESIM and respectively, A-ESIM and M-ESIM) communicating with NGSO systems in the FSS. In doing so, Amazon respectfully encourages TATT to authorize A-ESIM and M-ESIM in accordance with best practices outlined in Resolution 123 (WRC-23).	Consistent with the outcomes of WRC-23, updating the 17.3-17.7 GHz allocation will allow FSS operators, like Amazon's Project Kuiper, to provide high-speed satellite broadband service to even more users, including in Trinidad and Tobago. The 17 GHz band was already allocated to the FSS in Region 1 for space-to-Earth communications, and WRC-23 harmonized such use in ITU Region 2. Access by satellite operators to critical spectrum bands such as the 17 GHz band will facilitate the provision of accessible and high-quality broadband connectivity for consumers in the region and in Trinidad and Tobago. Therefore, Amazon respectfully encourages TATT, as it contemplates updating the TTFAT, to ensure that these frequencies in the Ka-band remain available for FSS use for space-to-Earth communications and to align the TTFAT with global and regionally harmonized spectrum allocations. In fact, in 2024, the Inter-American Telecommunication Commission (CITEL) Permanent Consultative Committee II (PCC.II) adopted Recommendation 69, which recommends that Member States facilitate the regional adoption of the use of the frequency band 17.3-17.7 GHz in the space-to-Earth direction for the operations of geostationary and non-geostationary satellite systems in the FSS; See Use of the Band 17.3-17.7 GHz (s-E) For Fixed-Satellite Service in Region 2, PCC.II/Rec. 69 (XLIII-24), Organization for American States, Inter-American Telecommunication Commission (2024) (uploaded as supporting information). Further, Amazon notes that ITU-R technical studies have established that Article 22 of the Radio Regulations provide sufficient protections for geostationary satellite	The Authority thanks Amazon for its contribution and for its commendation on the Authority's efforts to harmonise the allocation in the 17 GHz band consistent with the outcomes of the 2023 World Radiocommunication Conference (WRC-23). The Authority acknowledges Amazon's support for the adoption of ITU footnote 5.517B to allocate the 17.7–18.6 GHz, 18.8–19.3 GHz, 19.7–20.2 GHz (space-to-Earth), and the 27.5–29.1 GHz and 29.5–30 GHz (Earth-to-space) frequency bands for use by aeronautical earth stations in motion (A-ESIM) and maritime earth stations in motion (M-ESIM), respectively, i.e., A-ESIM and M-ESIM communicating with non-geostationary satellite orbit (NGSO) systems in the fixed satellite service (FSS). The Authority notes Amazon's request to ensure that spectrum in the Ka-band, including the 17 GHz band, continues to be available for FSS use for space-to-Earth communications and to align with global and regional harmonised spectrum allocations. The Authority welcomes the information shared on the adoption of Recommendation 69 by the Inter-American Telecommunication Commission (CITEL), which encourages CITEL member states to consider, depending on their conditions and needs, the development of

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				orbit (GSO) FSS and Broadcast-Satellite Service (BSS) operations in the 17.3-17.7 GHz band (space-to-Earth), and that compatibility with existing primary services in this band can be achieved. See Radiocommunication Study Group, Annex 19 to Working Party 4A Chairman's Report, Document 4A/978-E, Supporting Material that was Developed to Address WRC-23 Agenda Item 1.19, Study 9 at 4.1.2.5, International Telecommunication Union (July 13, 2023) (uploaded as supporting information). Additionally, Amazon notes that the adoption of a light-touch approach to the implementation of Resolution 123 would facilitate the delivery of global communications systems, reduce barriers to entry, and encourage broad participation of NGSO systems in Trinidad and Tobago. Amazon encourages TATT to implement the equivalent isotropically radiated power (EIRP) and power-flux density (PFD) restrictions in Annex 1 of Resolution 123 only in frequency bands and geographies where NGSO FSS earth stations are co-frequency with terrestrial system stations. As an alternative to the two (2) PFD masks in Resolution 123, which are overly burdensome, Amazon respectfully requests that TATT consider using the mask in Section 3.1 of Annex 1 to Resolution 123. Doing so would simplify A-ESIM and M-ESIM operations, protect terrestrial stations, and align with Decision 15(04) of the Electronic Communications Committee (ECC) of the European Conference of Postal and Telecommunications Administrations CEPT). The PFD levels have been the subject of studies carried out by the CEPT and demonstrated to protect terrestrial systems operating in the same band as A-ESIM and M-ESIM. Amazon is grateful to TATT for the opportunity to	regulatory actions to facilitate the regional adoption of the use of the frequency band 17.3–17.7 GHz in the space-to-Earth direction for the operations of geostationary and non-geostationary satellite systems in the FSS, taking into consideration the technical parameters adopted by WRC-23. The Authority acknowledges Amazon's support for the authorisation of A-ESIM and M-ESIM in accordance with best practices outlined in Resolution 123 (WRC-23) and its recommendation that the Authority adopt a light-handed approach to the implementation of the Resolution by applying the equivalent isotropic radiated power (EIRP) and power-flux density (PFD) restrictions in Annex 1 of Resolution 123 “only in frequency bands and geographies where NGSO FSS earth stations are co-frequency with terrestrial system stations” in order to reduce barriers to entry and encourage greater involvement of NGSO systems by accommodating international communications systems in Trinidad and Tobago. The Authority notes Amazon's recommendation and intends to follow studies on implementing section 3.1 of Annex 1 of Resolution 123 (WRC-23), “as an alternative to the two (2) PFD masks outlined in Resolution 123”. The Authority acknowledges Amazon's appreciation for the opportunity to comment on the TTFAT during this

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				contribute to this Consultative Document, and looks forward to working alongside the TATT to strengthen broadband access and improve connectivity in remote areas of Trinidad and Tobago. We welcome the opportunity to further discuss these comments or any other issues of interest in this submission.	single round of public consultation and notes its position to continue working with the Authority to improve connectivity in remote areas of Trinidad and Tobago.
7	TSTT	General	Telecommunications Services of Trinidad and Tobago Limited ("TSTT") appreciates that the Telecommunications Authority of Trinidad and Tobago ("the Authority") has given operators the opportunity to comment on these matters. It should be noted that TSTT's comments on this document do not preclude TSTT from making further comments in the future.		The Authority acknowledges TSTT's appreciation for the opportunity to comment in the single round of public consultation on the TTFAT and notes its position on future comments.
8	TSTT	5 Trinidad and Tobago Footnotes – TT Footnote TT73	TSTT notes that the 700 MHz band is not included in the list of frequencies. We recommend that all mobile frequency bands be included in the frequency ranges for use by cellular repeaters to ensure completeness.	The Authority should include the 700 MHz band in the frequency ranges for use by cellular repeaters.	TSTT is advised that footnote TT73 identifies the approved frequency ranges of two specific types of cellular repeaters that were approved for use in Trinidad and Tobago, in accordance with the <i>Schedule of Devices Eligible for Use under a Class Licence</i> (TATT 2024). Repeaters operating in the 700 MHz band must be assessed and approved for use before installation. This is to ensure that repeaters do not cause harmful interference to adjacent services such as public protection and disaster relief (PPDR). If approved, the Authority's <i>Schedule of Devices Eligible for Use under a Class Licence</i> and this footnote shall be updated.