



Ref: BTL/LRA/2024 (035)

May 1, 2024

Mr. Abraham Teck

Director
Regulated Services
Public Utilities Commission
4 Princess Margaret Drive
Marina Towers
2nd Floor
Belize City
Belize

Dear Mr. Teck,

RE: Speednet Communications Limited -26 February 2024 Licence Application -5G Mobile Services and Fixed Wireless Services countrywide 3.5GHz C Band

We write on the instructions of Belize Telemedia Limited (“**BTL**”) and we refer to the captioned matter.

BTL is in receipt of a copy of the public version of the application of Speednet Communications Limited (“**SCL**”) to the Public Utilities Commission (“**PUC**”) for frequency spectrum authorisation to provide 5G mobile and fixed wireless services countrywide. A copy of that application was obtained from the PUC’s website at:

https://www.puc.bz/speednet-communications-limited-license-application-5g-mobile-services-and-fixed-wireless-services-countrywide-3-5ghz_c-band-20240226-february-26-2024/

It has come to BTL’s attention after a perusal of SCL’s application, that SCL has failed to provide an answer to item 2.3.3 (b) of the application form for frequency spectrum (the “**Form**”). Item 2.3.3 (b) of the Form deals with the applicant’s proposed activities and requires the applicant to state in the Form the following:

‘Type of equipment and system (including manufacturer, model number, FCC Certificate & Current/Valid Type Approval).’

SCL’s omission of the type of equipment and system (including manufacturer, model number, FCC Certificate & Current/Valid Type Approval) from the Form, makes that application incomplete. It deprives the public and stakeholders in the telecommunications sector in Belize from meaningfully assessing SCL’s application and providing the PUC with any meaningful feedback and concerns in respect of SCL’s application as presented in the Form. Additionally, information on the type of equipment and system (including manufacturer, model number, FCC Certificate & Current/Valid



Type Approval) which SCL proposes to deploy once any authorisation is granted to SCL by the PUC, is not a trade secret nor is it confidential information which ought to be kept from the public. It is relevant information which will allow the PUC to fully consider SCL's application, after the public has been meaningfully consulted via the public version of SCL's application which should include SCL's answer to item 2.3.3 (b) of the Form, and the information made public in notices required to be made of the application by SCL in a newspaper in Belize. A public answer by SCL to item 2.3.3 (b) of the Form is in the public interest and the telecommunications sector's interest. It ensures that 5G spectrum is allocated in a responsible and efficient manner after all relevant information for public scrutiny including an answer to item 2.3.3. (b) of the Form has been provided to the public.

BTL therefore requests that the PUC require SCL to provide an answer to item 2.3.3. (b) of the Form in the public version of SCL's application for frequency spectrum authorisation to provide 5G mobile and fixed wireless services countrywide. BTL also requests that SCL's application for frequency spectrum authorisation to provide 5G mobile and fixed wireless services countrywide **be rejected as incomplete**, if SCL does not include SCL's answer to item 2.3.3 (b) of the Form in the public version of SCL's application.

The PUC's urgent attention hereto is appreciated.

Respectfully,

T. Kileru Awich (Mr.)
Internal Legal Counsel
Belize Telemedia Limited

- c. **Mr. Markhelm Lizarraga – Chairman of the Board of Directors, BTL**
- Mr. Ivan Tesucum – Chief Executive Officer, BTL**
- Mr. Ian Cleverly – Chief Financial Officer, BTL**
- Mr. Leonardo Calle – Chief Operations Officer, BTL**