APPENDIX

Please find below Axiata response to relevant Agenda Item as per the Public Consultation paper:

Agenda Item	Comments and Views on Proposed Malaysia's Positions
Fixed, Mobile and Broadcasting Issues	
1.1	"To consider, based on the results of the ITU-R studies, possible measures to address, in the frequency band 4800-4990 MHz, protection of stations of the aeronautical and maritime mobile services located in international airspace and waters from other stations located within national territories, and to review the pfd criteria in No. 5.441B in accordance with Resolution 223 (Rev.WRC-19)". Axiata recognises the importance of aeronautical and maritime mobile services (AMS/MMS) and their coexistence with both existing and future IMT deployments in the band 4.8-4.99 GHz. The 4.4 – 5 GHz frequency range has already been defined in 3GPP as NR band n79. We are of the views that any conditions or measures set to protect AMS/MMS services should not restrict deployment of IMT services in the band, hence Method C with the PFD limit may be acceptable by the mobile industry.
1.2	"To consider identification of the frequency bands 3300-3400 MHz, 3600-3800 MHz, 6425-7025 MHz, 7025-7125 MHz and 10.0-10.5 GHz for International Mobile Telecommunications (IMT), including possible additional allocations to the mobile service on a primary basis, in accordance with Resolution 245 (WRC-19)". We support for the global identification of IMT in the 7025-7125MHz frequency band. In addition to that, we note below bands are not in discussion for Region 3 but we agree with MCMC views that Malaysia may benefit from wider use of these band which will drive the economies of scale providing for affordable mobile services and devices. GlobalData forecasted 5G adoption in Malaysia to reach up to six percent by end of 2023 before rising to 46 percent by end of 2027. As such, it is important to ensure availability of sufficient spectrum supply in the market to support its future growth. Furthermore, the limited 5G spectrum bands currently available in Malaysia, underscores the need for

Malaysia to consider other bands to ensure sufficient supply of 5G spectrum can be made available which is a necessity for a wider success of 5G in Malaysia.

Therefore, Axiata proposes Malaysia to register its interest to consider these bands for future IMT through country footnote(s) in the Radio Regulations, together with other interested administrations at WRC-23.

- 3600-3800 MHz and 3300-3400 MHz (Region 2);
- 3300-3400 MHz (amend footnote in Region 1);
- 6425-7025 MHz (Region 1)
- 10.0-10.5 GHz (Region 2).

General and Regulatory Issues

10 New Agenda Item for IMT-2030 (6G)

6G is expected to become the primary mobile technology in the 2030s. It comes with a new spectrum consideration aiming to enable broader, contiguous channel bandwidths. In parallel to the 6G standardization work that is currently underway, a spectrum roadmap for 6G needs to be defined in advance. Taking into consideration the timeline for WRC decision to discuss and identify new mobile spectrum, which is typically up to 10 years, the work to identify new spectrum for 6G needs to be initiated at WRC-23.

Therefore, Axiata supports a new agenda item for WRC-27 regarding possible additional identification for IMT within the range 7-15 GHz.