

The Blue Zone
12393 South Gateway Park Place E100
Draper, Utah 84020
Phone (801)571-3355 ext 400

www.thebluezone.com

Points of contact

Diaa El-Mahdawy (diaa@frccorp.com)

Troy Page (tpage@thebluezone.com)

Michelle Gallagher (mgallagher@thebluezone.com)

** Please see our explanations below.

1	Do you agree on granting licenses at state level?	Agree
2	Do you agree on granting licenses to three operators?	Disagree
3	Do you agree on not banning any providers have a license on getting this license?	Agree
4	Do you agree on the system of grants?	Agree
5	Are the annual duties appropriate?	Agree
6	Do the proposed facilitations concerning the privilege grant help making services provided rapidly?	Agree
7	Does the license period allow for making proper economic revenue?	Disagree
8	Is the granted frequency allocation proper for providing services at state level?	Agree
9	Do the permitted services allow for achieving economic revenue?	Agree

1. Do you agree on granting licenses at state level.

Agree. No one Licensee will be able to deploy the entire country in a reasonable time. This will allow the Licensee's the ability to deploy in multiple markets or a single market while creating competition but not so much "noise" that we are conflicting with other Licensee's. The consumer will benefit from a state level license.

2. Do you agree on granting licenses to three operators.

Dissagree. We think that it would be better to select a minimum of 3 but no more than 5 Licensee's. We think that this will allow the NTRA a greater chance for success. If you have only three and one fails the customers' options are limited significantly. Having more than three will allow deployment to be much quicker.

3. Do you agree on not banning any providers have a license on getting this license.

Agree. All companies should be allowed to compete under the guidelines of the consultation paper provided by the NTRA.

4. Do you agree on the system of grants.

Agree. The consultation paper attended to most issues we believe to be important.

5. Are the annual duties appropriate.

Agree. We believe the 3% is fair and good compensation to the government and that the 50,000 is a reasonable amount for the frequency allocation.

6. Do the facilitations purposed by the NTRA as it relates to giving the license help in accelerating the deployment at a reasonable cost.

Agree. The NTRA proposed payment of 3% of the gross revenue to the government and payment of 50,000 EP per MHZ per year seems reasonable. Payment of 25% of the yet to be determined license fee in advance also seems reasonable. Payment of the balance of the license fee at the end of year 1 and year 2 seems unreasonable and in our opinion should be move to end of year 2 and end of year 3. The license fee must take into account the true financial abilities of the potential subscribers (customers) so it does not become a deterrent away from achieving a high rate of growth.

7. Does the license period allow for making proper economic revenue.

Disagree. All companies engaged will have to spend a great deal of money for infrastructure and technology and should be allowed to continue beyond the 7 years unless there are specific reasons that they should not continue. These reasons may include significant technical problems, significant customer dissatisfaction or violation of the rules and regulations outlined by the NTRA. If technologies change during this time the successful Licensee's should adapt and keep up with technology. We propose a 10 year license with two 5 year options to the Licensee's that are succeeding.

One question will arise due to this fact. If the NTRA does not extend a license for a Licensee, what happens to the equipment then deployed. The equipment is owned by the current Licensee and an asset of their company. Does the government, a current Licensee or a new Licensee purchase the existing equipment from the outgoing Licensee?

8. Is the granted frequency allocation proper for providing services at state level.

Agree. The network design will need to be very well engineered and designed so that the Licensee's do not intrude upon each other. Based on the space available, understanding that there will be 3 to 5 Licensee's and taking into consideration the frequency allocation detailed in the consultation paper the frequency will be sufficient.

9. Do the permitted services allow for achieving economic revenue.

Agree. As outlined in the consultation paper, the services we will be allowed to provide will provide sufficient opportunity to create the revenue needed for success.