



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

3.6 GHz Band Transition

Progress Report 2021

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Commission for Communications Regulation

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Chapter 1

1 Introduction and Background

- 1.1 The Commission for Communications Regulation (“ComReg”) is the statutory body responsible for the regulation of the electronic communications telecommunications, radio communications and broadcasting networks), postal and premium rate sectors in Ireland and in accordance with European (“EU”) and Irish law. ComReg also manages Ireland’s radio frequency spectrum (“radio spectrum” or “spectrum”) and the national numbering resource. Under the Communications Regulation Act 2002, as amended, ComReg has a range of functions and objectives in relation to the provision of electronic communications networks (“ECN”), electronic communications services (“ECS”) and post which includes ensuring the efficient and effective use of the national radio spectrum resource.
- 1.2 As noted in ComReg’s Electronic Communications Strategy Statement 2021 to 2023¹, radio spectrum, as a medium over which data can be transmitted, is an essential input in the supply of wireless/radio-based ECN / ECS for a diverse range of uses and end-users. It is a finite and valuable national resource as it underpins nearly all communications services in the State. These communication services include mobile telephony, wireless broadband, radio and television broadcasting and radio communications used by commercial business and by air and maritime transport.
- 1.3 Many services rely on wireless connectivity as part of the backbone linking mobile base stations, providing feeds to broadcast transmitters and telemetry links that allow the monitoring of disperse infrastructure, for example water reservoir levels and remote power transformers. The availability of spectrum is therefore necessary for the entry and expansion of many operators in electronic communications markets.
- 1.4 The growing demand for radio spectrum is driven by society’s ever-increasing demands for access to data-intensive services while on the move. In this context it is ComReg’s goal² that the management of spectrum facilitates competition, enhances connectivity and promotes efficient investment.
- 1.5 In May 2017, ComReg announced the results of its 3.6 GHz Band Spectrum Award (“Award”)³. The Award, which was conducted by auction, resulted in the successful

¹ ComReg document 21/70 – Electronic Communications Strategy Statement 2021 to 2023 – published 30 June 2021.

² ComReg’s Competition & Investment strategic intention – Goal 1.6: The management of spectrum and numbers facilitates competition, enhances connectivity and promotes efficient investment.

³ <https://www.comreg.ie/industry/radio-spectrum/spectrum-awards/3-6ghz-band-spectrum-award/>

assignment of all 350 MHz of spectrum rights available. The spectrum was offered in 594 lots spread over nine regions and assigned on a contiguous basis to five Winning Bidders.⁴

- 1.6 On the 16 December 2019, ComReg published its 3.6 GHz Band Transition Progress Report for 2019 as Document 19/115.⁵ In that document, ComReg provided the background to the 2017 3.6 GHz Band Spectrum Award, a summary of ComReg's 3.6 GHz Band Transition Principles and Framework, and an update on the progress of the 3.6 GHz Band Transition for 2019. That information has not been repeated in this report and readers are referred to Document 19/115 if they wish to access that information.
- 1.7 The purpose of this report is to provide interested parties with an update on the progress of 3.6 GHz Band Transition. This report also provides an update on the Transition Activities in 2021 by Existing Licensees and Winning Bidders since the 3.6 GHz Band Transition Progress Report published on the 8 December 2020.⁶
- 1.8 While transition in some areas remains, due in the main to the slower rollout of services by Winning Bidders than ComReg might have reasonably anticipated, a substantial amount of the spectrum in the award, in some cases all of it, is available for use by the Winning Bidder and is already being deployed in the provision of services such as higher speed FWA and 5G services.
- 1.9 Annex 1 of this report shows the Lots⁷ which have commenced as of 19 November 2021 under the Winning Bidders' 3.6 GHz Band Liberalised Use Licences.

⁴ The Winning Bidders are: Densair Ltd. (formerly known as Airspan Spectrum Holdings Ltd); Imagine Communications Ireland Ltd ("Imagine"); Meteor Mobile Communications Ltd ("Meteor"); Three Ireland (Hutchison) Ltd ("3IRL"); and Vodafone Ireland Ltd ("Vodafone"). See ComReg Document 17/46 – Information Notice: Results of the 3.6 GHz Band Spectrum Award – published 1 June 2017.

⁵ ComReg Document 19/115 – 3.6 GHz Band Transition Progress Report 2019 – published 16 December 2019. <https://www.comreg.ie/publication-download/3-6-ghz-band-transition-progress-report-2019>

⁶ ComReg Document 20/117 - 3.6 GHz Band Transition Progress Report 2020 – published 8 December 2020: <https://www.comreg.ie/publication/3-6-ghz-band-transition-progress-report-2020>

⁷ The 3.6 GHz Band spectrum award consisted of 594 lots spread over nine geographic regions (four rural and five urban), see ComReg Document 17/38 – Information Notice: Results of the 3.6 GHz Band Spectrum Award – published 22 May 2017

Chapter 2

2 Progress Update on the 3.6 GHz Band Transition

- 2.1 ComReg has actively engaged with Winning Bidders and Existing Licensees since the completion of the Award to develop and implement appropriate Transition Plans. ComReg has placed particular importance on areas where Winning Bidders have sufficiently developed plans to roll-out new services.
- 2.2 ComReg has also encouraged Winning Bidders and Existing Licensees to engage and develop mutually agreeable Transition Plan Proposals, which ComReg would then consider with a view to finalising a Transition Plan.
- 2.3 In December 2017, ComReg requested that Winning Bidders submit detailed Transition Plan Proposals by which to develop Localised Transition Plans (“LTPs”). The current position is summarised below:
- Meteor Mobile Communications Limited (trading as “eir”) (“Meteor”) and Vodafone Ireland Limited (trading as “Vodafone”) (“Vodafone”) provided their respective Transition Plan Proposals to ComReg in 2019;
 - Dense Air Ireland Limited (“Dense Air”) has yet to submit a Transition Plan Proposal; and
 - ComReg has commenced 100% of the Lots won Imagine Communications Ireland Limited (“Imagine”) and Three Ireland (Hutchison) Limited (“3IRL”);
- 2.4 Please refer to the ComReg website for up-to-date information regarding [3.6 GHz transition activities](#).⁸

2.2 Localised Transition Plans (“LTP”)

- 2.5 In April 2019, Vodafone submitted its final Transition Plan Proposal to develop LTPs for the rollout of new services across ten sites using 3.6 GHz Band spectrum previously held by Imagine under the FWALA licensing scheme. ComReg consulted on the proposal, and on 25 June 2019, ComReg implemented LTPs for Vodafone’s rollout of these ten sites. Those LTPs required Imagine to complete all relevant Transition Activities by 5 November 2019.

⁸ 3.6 GHz Band Transition: <https://www.comreg.ie/industry/radio-spectrum/spectrum-awards/3-6-ghz-band-transition/>

- 2.6 Upon receipt of a joint request from Imagine and Vodafone, ComReg extended the relevant Commencement and Transition Dates, and all Transition Activities were expected to be completed by 2 February 2020. Due to the Covid-19 pandemic, those Transition Activities were suspended by the agreement of both parties.
- 2.7 In September 2021, ComReg met with Vodafone where Vodafone confirmed that it was in discussion with Imagine regarding the recommencement of its Transition Activities. ComReg awaits the outcome of these discussions and remains available to assist the parties, if necessary, to complete transition.

2.3 Transition Activities – Existing Licensees

Existing Licensees

- 2.8 Progress has also been made in the orderly transition of the Existing Licensees from the 3.6 GHz Band, including:
- e-Nasc Éireann Teoranta ('Enet'), Lighthouse Networks Ltd (trading as Lightnet), PermaNET, Ripplecom Communications Ltd ("Ripplecom") and Western Broadband Networks Ltd (trading as WestNet) have all completed their transition from the 3.6 GHz Band; and
 - While the LTPs, which were developed and implemented to transition Imagine from 3.6 GHz Band Lots awarded to Vodafone are currently suspended, Imagine has continued with its Transition Activities more generally. Imagine has migrated from 54% of the Transition Service Areas ("TSA")⁹ originally licensed under its 3.6 GHz Band Transition Protected Licence ("TPL")¹⁰, and has reduced its spectrum usage by 41% in the TSAs licensed under its current TPL.¹¹

2.4 3.6 GHz Band spectrum availability

Winning Bidders

- 2.9 Significant progress has been made in the orderly transition of the 3.6 GHz Band and

⁹ Under Transition Licences existing licensees are permitted to operate in local service areas, referred to as Transition Service Areas (TSAs), where they previously operated under the 3.6 GHz Band FWALA licensing scheme which ceased following the Award on 31 July 2017. At the start of Transition, all TSAs had a 20 km radius boundary around a defined centre point. As Transition has progressed, the area of some TSAs has been reduced to reflect completion of Transition activities which affect only part of a TSA and to facilitate ongoing Transition Activities in the remainder of the TSA.

¹⁰ A Licence in the form as set out in Schedule 4 of the Wireless Telegraphy (3.6 GHz Band Licences) Regulations 2016, which entitles the holder to keep and have possession of Apparatus for the provision of FWA services in one or more than one FWALA Service Area, subject to the terms and conditions set out therein.

¹¹ In 2020, Imagine had migrated from 40% of the TSAs and had reduced its spectrum usage by 39% in the TSAs.

this progress has facilitated the commencement of spectrum rights for all new 3.6 GHz Band licensees to varying degrees:

- On 1 September 2018, ComReg commenced 100% of the Lots won by Imagine;
- On 1 September 2020, ComReg commenced 100% of the Lots won by 3IRL;
- As of 19 November 2021, ComReg has commenced 97% of the Lots won by Meteor;
- As of 19 November 2021, ComReg has commenced 79% of the Lots won by Dense Air; and
- As of 19 November 2021, ComReg has commenced 80% of the Lots won by Vodafone. ComReg offered to commence a further 2% of Vodafone’s Lots in July 2018 but this offer was declined by Vodafone.

Figure 1 below shows the percentage of commenced lots by each Winning Bidder as of 19 November 2021. Annex 1 shows the status of specific Lots in each region for each Winning Bidder.

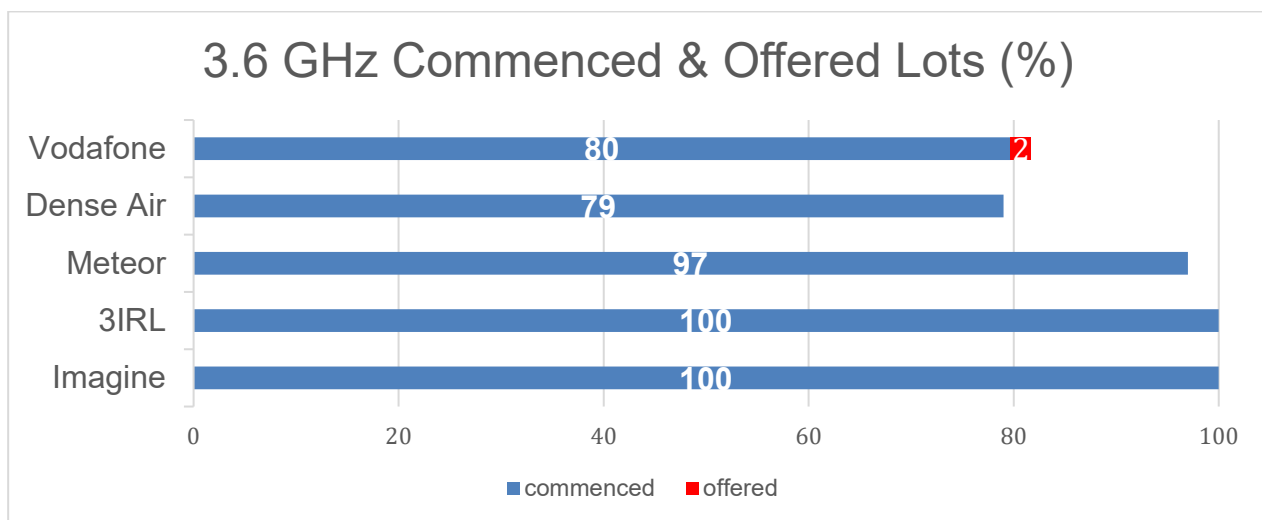


Figure 1: 3.6 GHz Commenced & Offered Lots (%)

2.5 Commercial services

2.10 While the rollout of services by Winning Bidders has been more protracted than ComReg had anticipated, a substantial amount of the 3.6 GHz Band spectrum has nonetheless been made available for use by Winning Bidders. This has enabled

Winning Bidders to launch higher speed FWA¹² and, more recently, 5G services.¹³

2.11 Figure 2 below shows the current rollout of sites by each of the Winning Bidders in each region. ComReg notes that Section 4 of S.I. No. 532/2016¹⁴ sets out obligations for the rollout of base stations by region and it intends to engage with the Winning Bidders in the new year with regard to compliance with their licence obligations.

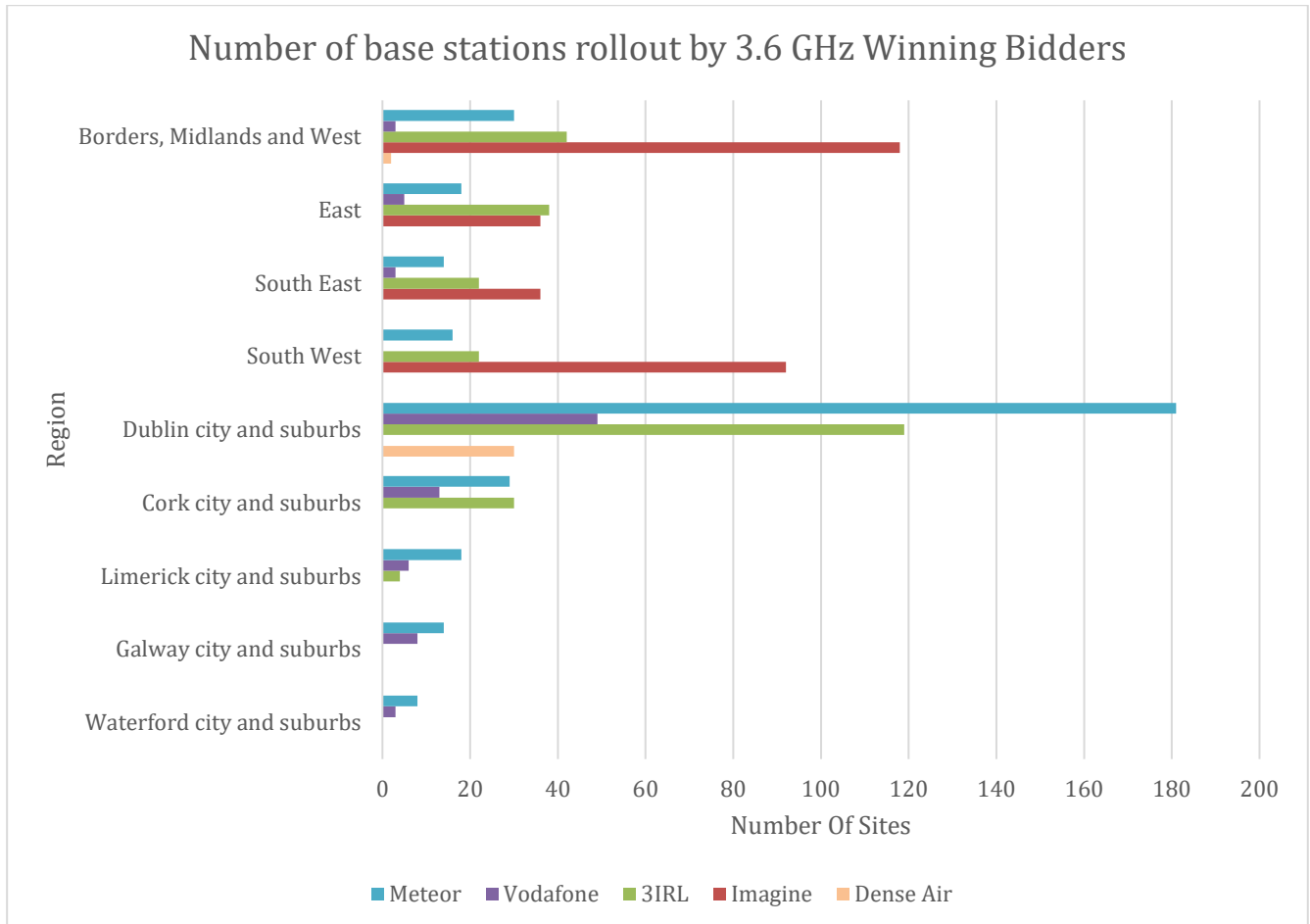


Figure 2: Number of base stations rollout by 3.6 GHz Winning Bidders

¹²<https://www.rte.ie/news/business/2021/0514/1221670-imagine-to-accelerate-rollout-of-5g-fixed-broadband/>

¹³ For example:

- In November 2021, Eir stated that it’s 5G network provides more than 70% population coverage in 322 towns and cities in all 26 counties of the Republic of Ireland: <https://www.eir.ie/5G/>
- In November 2021, 3IRL stated that 281 areas in Ireland have 5G network coverage: [5G For All With Ireland's Largest 5G Network | Three](#); and
- In July 2020, Vodafone deployed in 57 sites across 11 counties: <https://www.siliconrepublic.com/comms/vodafone-5g-ireland-ericsson-dss>.

¹⁴ S.I. No. 532/2016 - Wireless Telegraphy (3.6 GHz Band Licences) Regulations 2016 - [S.I. No. 532/2016 - Wireless Telegraphy \(3.6 GHz Band Licences\) Regulations 2016](#). (irishstatutebook.ie)

Chapter 3

3 3.6 GHz Band Spectrum Lease Licences

3.1 During 2020 and again in 2021, ComReg has issued Lease Licences to Imagine which allowed it to lease 3.6 GHz Band spectrum from Dense Air, Meteor, 3IRL and Vodafone at various locations. The Lease licenses have also assisted Imagine with its 3.6 GHz Band Transition Activities and have improved the delivery of services for consumers during the Covid-19 pandemic.

- In 2020, ComReg issued 3.6 GHz Band Spectrum Lease Licences to Imagine following the publication of four Spectrum Lease Determinations¹⁵; and
- In 2021, ComReg issued 3.6 GHz Band Spectrum Lease Licences to Imagine following the publication of a Spectrum Lease Determination¹⁶. Those lease licences expired on the 11 November 2021.

¹⁵ See:

- ComReg Document 20/51 – Spectrum Lease Determination: Lease of spectrum rights in the 3.6 GHz band from each of Meteor Mobile Communications Limited, Three Ireland (Hutchinson) Limited, and Vodafone Ireland Limited to Imagine Communications Ireland Limited. – published 19 June 2020;
- ComReg Document 20/77 – Spectrum Lease Determination: Lease of spectrum rights in the 3.6 GHz band from each of Meteor Mobile Communications Limited, Three Ireland (Hutchinson) Limited, and Vodafone Ireland Limited to Imagine Communications Ireland Limited – published 25 August 2020;
- ComReg Document 20/87 – Spectrum Lease Determination: Proposed lease of spectrum rights in the 3.6 GHz band from Dense Air Limited to Imagine Communications Ireland Limited – published 22 September 2020; and
- ComReg Document 20/97 – Spectrum Lease Determination: Proposed leases of spectrum rights in the 3.6 GHz band from each of Meteor Mobile Communications Limited, Three Ireland (Hutchinson) Limited, and Vodafone Ireland Limited to Imagine Communications Ireland Limited – published 13 October 2020.

¹⁶ See ComReg 21/46 – Spectrum Lease Determination: Lease of spectrum rights in the 3.6 GHz band from each of Dense Air Ireland Limited, Meteor Mobile Communications Limited and Vodafone Ireland Limited to Imagine Communications Ireland Limited – Published 10 May 2021:

Chapter 4

4 Next Steps

- 4.1 ComReg will actively engage with Winning Bidders and Existing Licensees in order to develop and implement appropriate Localised Transition Plans in line with the principles of the Transition licensing framework. Additionally, ComReg will commence Lots for Winning Bidders as they become available following the completion of necessary Transition Activities.
- 4.2 ComReg intends to publish non-confidential, substantive material relating to 3.6 GHz Band Transition following the completion of transition.

Annex 1: Commencement of Lots Under 3.6 GHz Band Liberalised Use Licences

A 1.1 Following completion of Transition Activities by Winning Bidders and Existing Licensees in the areas and frequency ranges affected, ComReg has commenced Lots in Regions under 3.6 GHz Band Liberalised Use Licences as follows. The tables below show the frequency assignments and associated regions for each 3.6 GHz Band Liberalised Use Licence granted to date, and the status of the associated Lots as of 19 November 2021. Please refer to the ComReg website for up-to-date information regarding [3.6 GHz transition activities](#).¹⁷

A 1.2 The colours in the tables indicate the following:

Green – Lots that have commenced;

Pink – Lots that have not yet commenced;

Amber – Lots that ComReg offered to commence but were declined by the relevant licensee;

Blue – Lots no longer refunded in line with para 2.75 of the Information Memorandum (“IM”) ¹⁸: Delayed availability of Lots caused by Winning Bidder; and

Black – Lots that are not applicable to the Licensee.

¹⁷ 3.6 GHz Band Transition: <https://www.comreg.ie/industry/radio-spectrum/spectrum-awards/3-6-ghz-band-transition/>

¹⁸ ComReg Document 16/71 - 3.6 GHz Band Spectrum Award - Information Memorandum – Published 29 August 2016

| Dense Air | | | | | | | | | | |
|------------------|----------------------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----|
| | FREQUENCY RANGE | | 3580 - 3585 MHz | 3585 - 3590 MHz | 3590 - 3595 MHz | 3595 - 3600 MHz | 3600 - 3605 MHz | 3605 - 3610 MHz | 3610 - 3615 MHz | |
| | | 3410 - 3435 MHz | | | | | | | | |
| REGION | LOT | A1 | B22 | B23 | B24 | B25 | B26 | B27 | B28 | B28 |
| | Borders, Midlands and West | | | | | | | | | |
| | South West | | | | | | | | | |
| | East | | | | | | | | | |
| | South East | | | | | | | | | |
| | Dublin City and Suburbs | | | | | | | | | |
| | Cork City and Suburbs | | | | | | | | | |
| | Limerick City and Suburbs | | | | | | | | | |
| | Galway City and Suburbs | | | | | | | | | |
| | Waterford City and Suburbs | | | | | | | | | |

| Imagine | | | | | | | | | | | | | |
|----------------|----------------------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|
| | FREQUENCY RANGE | 3560 - 3565 MHz | 3565 - 3570 MHz | 3570 - 3575 MHz | 3575 - 3580 MHz | 3580 - 3585 MHz | 3585 - 3590 MHz | 3590 - 3595 MHz | 3595 - 3600 MHz | 3600 - 3605 MHz | 3605 - 3610 MHz | 3610 - 3615 MHz | 3615 - 3620 MHz |
| REGION | LOT | B18 | B19 | B20 | B21 | B22 | B23 | B24 | B25 | B26 | B27 | B28 | B29 |
| | Borders, Midlands and West | | | | | | | | | | | | |
| | South West | | | | | | | | | | | | |
| | East | | | | | | | | | | | | |
| | South East | | | | | | | | | | | | |

| Meteor | | | | | | | | | | | | | | | | | | | | | |
|---------------|----------------------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----|--|--|
| | FREQUENCY RANGE | 3615 - 3620 MHz | 3620 - 3625 MHz | 3625 - 3630 MHz | 3630 - 3635 MHz | 3635 - 3640 MHz | 3640 - 3645 MHz | 3645 - 3650 MHz | 3650 - 3655 MHz | 3655 - 3660 MHz | 3660 - 3665 MHz | 3665 - 3670 MHz | 3670 - 3675 MHz | 3675 - 3680 MHz | 3680 - 3685 MHz | 3685 - 3690 MHz | 3690 - 3695 MHz | 3695 - 3700 MHz | | | |
| | | LOT | B29 | B30 | B31 | B32 | B33 | B34 | B35 | B36 | B37 | B38 | B39 | B40 | B41 | B42 | B43 | B44 | B45 | | |
| REGION | Borders, Midlands and West | | | | | | | | | | | | | | | | | | | | |
| | South West | | | | | | | | | | | | | | | | | | | | |
| | East | | | | | | | | | | | | | | | | | | | | |
| | South East | | | | | | | | | | | | | | | | | | | | |
| | Dublin City and Suburbs | | | | | | | | | | | | | | | | | | | | |
| | Cork City and Suburbs | | | | | | | | | | | | | | | | | | | | |
| | Limerick City and Suburbs | | | | | | | | | | | | | | | | | | | | |
| | Galway City and Suburbs | | | | | | | | | | | | | | | | | | | | |
| | Waterford City and Suburbs | | | | | | | | | | | | | | | | | | | | |

| Three | | | | | | | | | | | | | | | | | | | | | | |
|---------------|----------------------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----|
| | FREQUENCY RANGE | 3700 - 3705 MHz | 3705 - 3710 MHz | 3710 - 3715 MHz | 3715 - 3720 MHz | 3720 - 3725 MHz | 3725 - 3730 MHz | 3730 - 3735 MHz | 3735 - 3740 MHz | 3740 - 3745 MHz | 3745 - 3750 MHz | 3750 - 3755 MHz | 3755 - 3760 MHz | 3760 - 3765 MHz | 3765 - 3770 MHz | 3770 - 3775 MHz | 3775 - 3780 MHz | 3780 - 3785 MHz | 3785 - 3790 MHz | 3790 - 3795 MHz | 3795 - 3800 MHz | |
| | | LOT | B46 | B47 | B48 | B49 | B50 | B51 | B52 | B53 | B54 | B55 | B56 | B57 | B58 | B59 | B60 | B61 | B62 | B63 | B64 | B65 |
| REGION | Borders, Midlands and West | | | | | | | | | | | | | | | | | | | | | |
| | South West | | | | | | | | | | | | | | | | | | | | | |
| | East | | | | | | | | | | | | | | | | | | | | | |
| | South East | | | | | | | | | | | | | | | | | | | | | |
| | Dublin City and Suburbs | | | | | | | | | | | | | | | | | | | | | |
| | Cork City and Suburbs | | | | | | | | | | | | | | | | | | | | | |
| | Limerick City and Suburbs | | | | | | | | | | | | | | | | | | | | | |
| | Galway City and Suburbs | | | | | | | | | | | | | | | | | | | | | |
| | Waterford City and Suburbs | | | | | | | | | | | | | | | | | | | | | |

| Vodafone | | | | | | | | | | | | | | | | | | | | | | |
|----------|----------------------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|
| REGION | LOT | FREQUENCY RANGE | | | | | | | | | | | | | | | | | | | | |
| | | 3475 - 3480 MHz | 3480 - 3485 MHz | 3485 - 3490 MHz | 3490 - 3495 MHz | 3495 - 3500 MHz | 3500 - 3505 MHz | 3505 - 3510 MHz | 3510 - 3515 MHz | 3515 - 3520 MHz | 3520 - 3525 MHz | 3525 - 3530 MHz | 3530 - 3535 MHz | 3535 - 3540 MHz | 3540 - 3545 MHz | 3545 - 3550 MHz | 3550 - 3555 MHz | 3555 - 3560 MHz | 3560 - 3565 MHz | 3565 - 3570 MHz | 3570 - 3575 MHz | 3575 - 3580 MHz |
| | | B1 | B2 | B3 | B4 | B5 | B6 | B7 | B8 | B9 | B10 | B11 | B12 | B13 | B14 | B15 | B16 | B17 | B18 | B19 | B20 | B21 |
| | Borders, Midlands and West | | | | | | | | | | | | | | | | | | | | | |
| | South West | | | | | | | | | | | | | | | | | | | | | |
| | East | | | | | | | | | | | | | | | | | | | | | |
| | South East | | | | | | | | | | | | | | | | | | | | | |
| | Dublin City and Suburbs | | | | | | | | | | | | | | | | | | | | | |
| | Cork City and Suburbs | | | | | | | | | | | | | | | | | | | | | |
| | Limerick City and Suburbs | | | | | | | | | | | | | | | | | | | | | |
| | Galway City and Suburbs | | | | | | | | | | | | | | | | | | | | | |
| | Waterford City and Suburbs | | | | | | | | | | | | | | | | | | | | | |