

**The Chairman
Malaysian Communication and Multimedia Commission (MCMC)**

MCMC Tower 1
Jalan Impact, Cyber 6
63000 Cyberjaya
Selangor Darul Ehsan
Malaysia

(Attention: Spectrum Planning and Assignment Division)

Subject: Response to MCMC's Invitation for Insights and Contributions on WRC-23 Agenda Item 1.2

Dear Mr. Chairman,

I am writing on behalf of the Social Economic Research Initiative (SERI) to express our gratitude for the opportunity to contribute our insights and recommendations pertaining to the envisaged agenda items for the World Radiocommunication Conference 2023 (WRC-23). Specifically, we wish to respond to Agenda Item 1.2 related to fixed, mobile, and broadcasting issues. Our response aims to provide valuable input into the strategic discussions surrounding the enhancement of telecommunication capabilities in Malaysia and the broader Asia-Pacific region.

SERI is a non-partisan think tank established with the explicit mission of identifying and promoting evidence-based policies that mitigate the exacerbation of inequality. Operating without ideological or race-based constraints, we steadfastly believe in democratizing access to opportunity, preserving the environment, and harnessing the potential of technology to address societal challenges. Our commitment lies in fostering harmonious coexistence among humanity, the planet, and technological advancements, which we believe is pivotal for achieving a more equitable and prosperous future for all. SERI takes a particular interest in matters of digital economy, and recommends policies that aim to bridge the digital divide.

In response to Agenda Item 1.2, SERI wishes to offer the following recommendations to enhance the telecommunication landscape:

1. Joining region 3 country footnote of International Mobile Telecommunications (IMT) identification in the frequency band 6 425-7 025 MHz under Agenda

Item 1.2 in WRC-23.

2. Support for IMT Identification in Frequency Range 7,025-7,125 MHz
3. Support for identification of IMT frequency bands in other regions.

In conclusion, we commend MCMC's proactive approach in seeking diverse perspectives for shaping the WRC-23 agenda. We look forward to the opportunity to collaborate further and contribute to the advancement of Malaysia's telecommunications landscape, ensuring its alignment with the broader goals of social and economic progress.

Thank you for considering SERI's insights and recommendations. We eagerly await the opportunity to engage in constructive discussions and collaborate on achieving a technologically empowered and inclusive future.

Sincerely,

A handwritten signature in black ink, appearing to be 'Rashaad Ali', written in a cursive style.

Rashaad Ali
Chief Operations Officer
Social Economic Research Initiative (SERI)
[Attachment: SERI's Full Response to Agenda Item 1.2]

Agenda Item	Comments and Views on Proposed Malaysia's Positions
Fixed, Mobile and Broadcasting Issues	
<p>1.2</p>	<p>The forthcoming World RadioCommunication Conference 2023, scheduled for later this year, holds significant importance for Malaysia. This conference is poised to deliberate upon and assess the global regulatory framework governing spectrum utilization. The Malaysian Communication and Multimedia Commission (MCMC) has extended an invitation to the general public, encompassing industry experts and stakeholders, to provide their insights and contributions pertaining to the envisaged agenda items for WRC-23 concerning Malaysia.</p> <p>In acknowledgment of the proposition made by MCMC, Social and Economic Research Initiative (SERI) suggests that Malaysia recommend including region 3 country footnote of International Mobile Telecommunications (IMT) identification in the frequency band 6 425-7 025 MHz under Agenda Item 1.2 in WRC-23. As Malaysia and Asia-Pacific countries (APAC) within region 3's mobile industry continues to demonstrate substantial growth, the allocation of a 100 MHz mid-band for region 3 in the context of Agenda Item 1.2 may not adequately address the burgeoning demands of the region, given its status as the most densely populated. Therefore, SERI would like to highlight the necessity for a comprehensive spectrum allocation that adequately accommodates the increasing requirements of this region.</p> <p>In addition, SERI endorses the IMT identification within the frequency range of 7,025-7,125 MHz. Nonetheless, this support is contingent upon the implementation of suitable regulatory and technical parameters, incorporating the outcomes of comprehensive studies aimed at safeguarding the integrity of services that hold primary allocation rights within this frequency band, as well as in adjacent spectral regions.</p>

In response to the deliberation regarding the identification of IMT frequency bands within various regions under Agenda Item 1.2 of WRC-23, SERI supports Malaysia's stance of non-opposition towards these identifications.

SERI believes that as the demand for IMT applications, including enhanced mobile broadband (eMBB), massive machine type communications (mMTC), and ultra-reliable low-latency communications (URLLC), continues to rise, it is essential to explore the allocation of additional IMT spectrum in mid-range frequency bands. This approach plays a crucial role in guaranteeing the harmonized utilization of spectrum resources and fostering compatibility across evolving communication technologies. It stands as a vital factor for facilitating upcoming deployments and tackling potential hurdles in the implementation of these applications and services, especially in the context of Malaysia's expanding mobile industry.