

TO
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EUROPEAN COMMISSION,
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**POSITION OF COSMO BULGARIA MOBILE EAD ON THE DRAFT RSPG
OPINION ON LICENSED SHARED ACCESS**

DEAR SIR AND MADAM,

In relation to the Draft RSPG opinion on Licensed Shared Access (LSA) we present to you the position of "Cosmo Bulgaria Mobile" EAD to the perspectives of shared use of licensed spectrum in Bulgaria.

"Cosmo Bulgaria Mobile" EAD (CBM) is one of the three leading telecom operators in Bulgaria. The undertaking was founded in 2001 and immediately had a huge impact on the mobile market as it was the second mobile operator in Bulgaria, which led to increased development of the competition, provision of new services and better conditions for the services rendered to end users. The undertaking's more than 10 year presence on the Bulgarian telecom sector makes it extremely committed and responsible on the different regulatory issues, as is the use of the radiofrequency spectrum. The Bulgarian Ministry of Transport, Information Technology and Communications has requested comments on the RSPG draft opinion on Licensed Shared Access and here is CBM's position.

The constant development of the use of radio spectrum for civil needs is decisive for the effective use of the scarce resources and creating conditions for the development of a competitive communications sector and business development in order to expand it to the extent of the social and economic benefits arising from the use of the radio frequency resource.

The situation on the Bulgarian telecom sector regarding the use of radio spectrum and the CBM own experience and expertise as spectrum holder and mobile operator show that the current licensed bands are very intensively used. At the moment the provided radio frequency resources by the Bulgarian NRA (Communications Regulation Commission) are sufficient for the voice and mobile data demands, but taking into account the constant growth of the mobile data traffic and the increasing use of smart phones and tablets with internet access it is obvious that the radio frequency resources will be very important in the future to sustain the data traffic growth and to maintain quality voice services.

Therefore, the accelerating growth in wireless data traffic will naturally lead to future needs for acquisition of new spectrum resource. As such, CBM's opinion is that the LSA mechanism is markedly applicable primarily to the government/military incumbents (and to less extent to mobile operators), where geographic-based or time-based spectrum sharing could be applied. Moreover we believe that in all cases, the sharing agreements between the different parties under the LSA framework are a prerequisite for the establishment of specific technical parameters and requirements, where comes the role of the Bulgarian NRA (CRC). CRC should study the possibilities for LSA, conduct public discussions on the matter and to

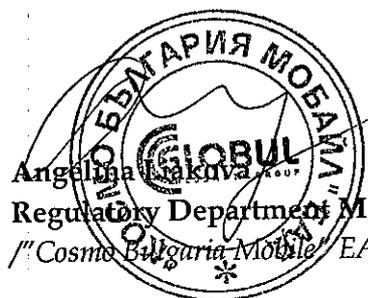


define the technical and operational conditions related to the LSA, which will guarantee an efficient use of the radio frequency resources. Hereinafter it is also necessary for the Bulgarian NRA to establish an efficient national sharing framework and control mechanisms in order to guarantee workability of the approach and provide both certain quality of service (QoS) and acceptable level of interference. All of this should be followed by a transparent and non-discriminatory licensing process for granting individual rights of use of spectrum to LSA users, in accordance with the sharing framework.

In conclusion, CBM recognizes LSA as a prospective regulatory approach that could provide new and effective sharing opportunities for the current and new undertakings, providing or using networks or services, and at the same time increase the efficiency of the radio spectrum's utilization.

"Cosmo Bulgaria Mobile" EAD believes that the above opinions shall be considered as they represent the approach on the matter of one of the leading telecommunication undertakings in Bulgaria. We remain at your disposal for further discussions, clarifications and assistance on the matter.

Best regards,


Angelina Lakova
Regulatory Department Manager
/"Cosmo Bulgaria Mobile" EAD/