



04 June 2021

**NATIONAL TELECOMMUNICATIONS COMMISSION**  
NTC building, BIR Road, Diliman,  
Quezon City,

Attention: **HON. EDGARDO V. CABARIOS**  
Deputy Commissioner

Subject: **POSITION ON THE PROPOSED MEMORANDUM CIRCULAR  
CLARIFYING MC 09-09-2003 AND MC 06-08-2005**

Dear Deputy Commissioner Cabarios,

Please see below Philippine Telegraph and Telephone Corporation's (PT&T) comments on the proposed Memorandum Circular.

Comment on Section 1.

PT&T is of the opinion that the National Telecommunications Commission (NTC) should seriously consider not imposing Spectrum User Fee (SUF) for the use of Wi-Fi frequencies. PT&T believes that there is a clamor for this based on the hearings conducted by the House of Representatives on House Bill No. 8168 which seeks to establish a Zero SUF Policy for the use of Wi-Fi frequencies.

Comment on Section 2.

PT&T opposes the proposal to limit the use of radio links only to 4<sup>th</sup>, 5<sup>th</sup>, and 6<sup>th</sup> class municipalities. PT&T believes that this policy is discriminatory and will only favor large telecommunications companies. Instead of fostering active competition between telecommunications providers for the benefit of the consumers, the proposed Memorandum Circular will limit the competition to the detriment of the consuming public. PT&T understands that this proposed change is intended to improve the services being offered to the public. While PT&T agrees with this, it should however be done in a fair and non-discriminatory manner.

PT&T respectfully submits that the use of radio links utilizing the Wi-Fi spectrum should be allowed nationwide and not only in 4<sup>th</sup>, 5<sup>th</sup> and, 6<sup>th</sup> class" municipalities.

Limiting the use of radio links to a limited and defined areas will hamper the speedy roll-out of the much-needed telecommunications infrastructure thereby delaying the provisioning of reliable and affordable internet services. Clearly, the proposal to limit the use of radio links runs counter to the policy and objective of providing internet access to every Filipino.

Thank you for your kind attention.

Very truly yours,



**JUANITA C. RIMANDO**

Vice President

Wholesale, Carrier and Government Relations