

Issue 1: 12<sup>th</sup> April 2002

**BT response to the RA Consultation on  
Spectrum Pricing: Year Five**

Submission date: April 12th 2002



## Introduction

1. BT recognises that this latest consultation on spectrum pricing covers the completion of, or next steps in, the introduction of changes set out in earlier consultations, or other measures which have been discussed in the various RA consultation committees. BT has therefore previously provided comments on many of the relevant issues and at this stage we have only a few further points of detail to raise, as set out below.

## Detailed Comments

2. BT supports the proposals set out in para 2.4 concerning the proposed deregulation of the 58GHz band and licence-exemption for fixed links that comply with the relevant standards.
3. Concerning the proposal in para 2.8, BT has some concerns over the introduction of higher fees for links requiring “exceptionally high availability – in excess of 99.99%” since such requirements can follow from international transmission standards. The introduction of ATPC may alleviate the effects of higher maximum power for higher quality links and we would support further study of the issues before conclusions are drawn.
4. BT is in agreement with the proposals for permanent and transportable Earth stations that have been discussed in industry liaison bodies over the last year, but wishes to clarify some details. In para 2.11 there is no indication of the point at which the operational maximum power is specified, although it is an important factor in calculating the fee. We understand this to be at the antenna flange. In addition, there is no mention of fees for TESs which may be required for short-term use. We would like to see the ability to licence extra TESs for periods of, say, one month at a rate pro rata to the appropriate annual fee.
5. BT is broadly in agreement with the proposals for Network Licences for large networks of interactive user terminals. It is noted that for fee calculation purposes it is proposed to set the minimum number of terminals at 50. We assume that it would be acceptable to actually implement a network of, say, 25 terminals but to pay a licence fee for 50 terminals. It is also assumed that existing VSAT networks which meet the criteria for the proposed Network Licence, e.g. operate in the appropriate frequency bands, will migrate to the new licensing and fee arrangements.