

Do you agree in principle that RSA should be introduced for satellite services?

Yes

For which satellite services and in which bands should RSA be introduced?

All bands possible, on the transmit side only. This is a definition which changes over time, as technical changes take place, so RSA should be flexibly defined to allow new bands to be brought in as and when appropriate.

How should recognition granted ....

I am not technical enough to answer this question!

Would tradability of RSA and interchangeability with licenses be advantageous and how useful would it be in practice?

Yes. The main point would be to establish that the 2 are equivalent - as much as is possible. We can't say how useful this would be in practice, and we shouldn't try to. Consolidation in the industry and/or technology advances might make this important in situations we cannot currently envisage. The important thing is to establish the principle, that RSA and licences are 2 faces of the same thing.

Should RSA be perpetual or fixed term and what factors should be taken into account in deciding security of tenure?

Fixed term. The length of tenure should take into account the likely capital investment needed in order to derive benefit from the bands in question, and also possible changes in the national need for spectrum. Longer security of tenure could perhaps also be offered for a premium price, or an option to renew for a second fixed term.

How should spectrum pricing principles apply to RSA?

Auction, and where this is not possible, least cost alternative + margin on top. I don't like administrative incentive pricing, because it is impossible to work out. I don't like cost recovery pricing because it generates too little return for the taxpayer! However, cost recovery is ok if it is in an area of social benefit.

How should administrative incentive pricing fees be calculated in practice?

See above - avoid them because I can't see a satisfactory answer to this question!

Are there services other than satellite for which application of RSA could be advantageous?

I did not understand the document on this point. For example, what is the issue with the Crown user? They should pay on the same basis as everyone else. I know it is money out of one pocket into the other, but this should be done in order to make the system transparent and fair, and in order to show the real cost of the Crown services. It will also provide an incentive for them to be more efficient, and will simplify the administration of the whole system.

I do think RSA should be applied to terrestrial transmissions from outside the UK. If the transmitter wants protection of the bands used, they should pay the RSA fees whether they use satellite or terrestrial means to broadcast on them.

Please do not hesitate to call me if you have any questions on this input.

Jane E Tozer