



Response to Ofcom's consultation on:

**Authorisation of terrestrial mobile networks
complementary to 2 GHz Mobile Satellite Service (MSS)**

- **A consultation on the licensing of 2 GHz MSS Complementary Ground Component (CGC) for aeronautical use**

(Issued by Ofcom on 22 February 2016)

**BT plc and EE Ltd
18 April 2016**

Question 1: Do you have comments on Inmarsat's planned use of the spectrum, our planned approach to authorising the overall MSS and CGC system, the availability of the Network and Spectrum Access 2 GHz Licences, or any other aspect of the scope and purpose of this document?

In principle BT/EE has no objection to the proposals to introduce the proposed MSS and CGC system to provide communications services on aircraft. We have focused on the technical aspects in preparing our response (see Q2).

We note that Ofcom will consult separately on the authorisations for the terminals installed on the aircraft and we will consider that aspect when the details are available.

Question 2: Do you have any comments on the technical conditions we propose to include in the Network 2 GHz Licence?

The use restriction at 1000m, together with appropriate A2G Aeronautical device transmit filtering, should somewhat mitigate effects of interference into adjacent spectrum used by ECN base stations. We note that the CEPT studies have addressed the sharing and compatibility issues in some detail but a few issues which may be implementation specific remain, including aggregate interference and choice of interference criterion.

Concerns about localised interference to the terrestrial network near airports may potentially be mitigated by requiring switch off of the aircraft device at a higher altitude, or other measures including most appropriate siting of ground stations in close vicinity of airport.

BT/EE would be willing to work directly with DT/Inmarsat and Ofcom to resolve any outstanding technical concerns in relation to potential impact on our immediately adjacent mobile spectrum once an actual network design with refined ground station locations is available.

Question 3: Do you have any comments on our proposals for the fee level, fee structure and implementation of the location factor for the fee for the Network 2 GHz Licence?

No comments
