



## Earth Stations on Mobile Platforms

### About Arqiva

Arqiva is the communications infrastructure and media services company operating at the heart of the broadcast and mobile communications industry and at the forefront of network solutions and services in an increasingly digital world. Arqiva provides much of the infrastructure behind television, radio and wireless communications in the UK and has a growing presence in Ireland, mainland Europe and the USA.

As well as supporting cellular, wireless broadband, video, voice and data solutions for public and private sector customers, Arqiva also provides global satellite based services to the broadcast, communications, security, oil/gas, and exploration sectors, using its five UK teleports as well as facilities in the Middle East, Asia and the Americas.

A three times winner of the World Teleport Association's WTA Teleport Operator of the Year award, Arqiva is a major player in the UK's satellite communications business, operating over 85 antennas in the UK alone, and providing Telemetry, Tracking and Command support services to some of the leading satellite operators.

Additionally, Arqiva operates shared radio sites throughout the UK and Ireland including masts, towers and rooftops from under 30 to over 300 metres tall. In Arqiva WiFi we own one of the UK's largest WiFi hotspot providers that enables us to build a unique proposition for WiFi hotspot and outdoor WiFi provision in the UK.

Arqiva is a founder member and shareholder of Freeview (Arqiva broadcasts all six Freeview multiplexes and is the licensed operator of two of them) and was a key launch technology partner for Freesat. We own Connect TV, the first company to launch a live IP streaming channel on Freeview. Arqiva is also the licensed operator of the Digital One – the national commercial DAB digital radio multiplex.

Our major customers include the BBC, Sky, Discovery, Turner, ITV, and other UK Public Service Broadcasters, SES, Intelsat and other major satellite operators, many of the leading global mobile phone operators, (including all four in the UK), the Metropolitan Police, and international security and defence agencies

Arqiva is owned by a consortium of long-term investors and has its headquarters in Hampshire, with teleports and major UK offices in London, Buckinghamshire, Bedfordshire and Yorkshire.

## Earth Stations on Mobile Platforms

### Introduction

Arqiva welcomes the opportunity to provide a response to Ofcom's consultation on the authorisation of Earth Stations on Mobile Platforms (ESOMPs). Our responses to the specific questions are below.

***Question 1) Do you agree that Ofcom should authorise the use of ESOMPs in the UK in the frequency bands 27.5 – 27.8185 GHz, 28.4545 – 28.8265 GHz and 29.4625 – 30 GHz?***

Yes, Arqiva agrees with Ofcom's proposal to authorise these bands for ESOMPs in Geostationary Orbit, in these specific bands (i.e. 27.5 – 27.8185 GHz, 28.4545 – 28.8265 GHz and 29.4625 – 30 GHz).

However Ofcom should not extend this authorisation further, and specifically it should not extend it into the 27.8285 to 28.4445 and 28.8365 to 29.4525 GHz bands. ESOMPs could not be extended into these bands without causing harmful interference to existing or planned terrestrial services.

***Question 2) Do you agree with Ofcom's proposal to exempt from licensing the establishment, installation and use of land-based ESOMP equipment that transmits in the frequency bands 27.5 – 27.8185 GHz, 28.4545 – 28.8265 GHz and 29.4625 – 30 GHz?***

Yes, in principle.

However, to ensure a sharing environment can be created, that allows technical coexistence of ESOMPs and Teleports further technical parameters will need to be included, notably regarding directionality and off axis emissions; Arqiva feel that limiting the EIRP and explicit reference to the ETSI EN 303 978 reference to be sufficient to address this need.

***Question 3) Do you agree that ESOMP equipment mounted on aircraft or ships should be licensed to transmit in the frequency bands 27.5 – 27.8185 GHz, 28.4545 – 28.8265 GHz and 29.4625 – 30 GHz using the existing Notice of Variation process?***

Yes, we agree that it is appropriate to licence airborne and shipborne terminal using the existing NoV process.

However this should be subject to variations that require full compliance with the Interface Requirement, specifically EIRP and conformity to the ETSI EN 303 978 specification.

***Question 4) Do you agree with the proposed technical provisions given in the Draft Interface Requirement and Draft NoVs?***

While we agree with the principle of using the NoV process there are two concerns with this proposal that need to be addressed:

- Firstly, we would ask that the Interface Requirement makes reference not only to a maximum EIRP limit, but also to the ETSI EN 303 978 specification.
- Secondly, neither the NoV nor the Draft Interface Requirement appear to be sufficient to capture how to implement, and even police, compliance with policy and licence obligations at UK airspace and UK waters boundaries.