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**VIA E-MAIL**

**Re: Earth Stations on Mobile Platforms ("ESOMPs") ("the Consultation")**

***O3b Limited ("O3b")***, a Jersey entity and a UK satellite operator, respectfully submit this letter in response to the Consultation, and are grateful for the continued opportunity to work with Ofcom on the United Kingdom's telecom regulatory regime.

O3b are planning to operate a global, medium-Earth orbit ("MEO"), non-geostationary satellite system that will provide much-needed broadband connectivity around the world using cutting-edge technology in the Ka band, and specifically in the bands involved in this Consultation.<sup>1</sup> O3b launched their first four satellites earlier this year, and will launch the next four in the near future.

O3b assume that the consultation covers both GSO and NGSO satellites, so our response is based on this assumption. O3b recognize (and appreciate) Ofcom's leading role at the CEPT to advance a decision about NGSO ESOMPs similar to decision ECC 13(01) about the harmonized use and free circulation of ESOMPs. As such, O3b encourage Ofcom to allow ESOMPs for NGSOs in the bands listed in the consultation. Furthermore, O3b encourage Ofcom to consider allowing ESOMPs for NGSO satellites in the 18.8-19.3 GHz/28.6-29.1 GHz band, which is subject to coordination under RR 9.11A of the ITU Radio Regulations. In addition, we support the responses submitted by ESOA and the GVF.

ESOMPs may be one of the most exciting issues in the satellite industry today. ESOMPs are global by nature, and although this Consultation concerns only UK territory, as the UK is a global policy leader, other administrations (especially the British Overseas Territories and Crown Dependencies) may follow Ofcom's position on ESOMPs. O3b encourage Ofcom to be cognizant of this leadership position when adopting UK ESOMP regulations.

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<sup>1</sup> O3b plan to operate across the globe in the bands 17.8-18.6 GHz, 18.8-19.3 GHz, 27.6-28.4 GHz and 28.6-29.1 GHz.

**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, O3b 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. O3b

O3b understand that parts of the interstitial bands (27.8285-28.4445 GHz and 28.8365-29.4525 GHz) have been limited to licenses for terrestrial Fixed Service in the UK, despite being allocated also to FSS in ITU Region 1 (and indeed in all three ITU Regions). O3b believe that the very nature of an ESOMP is to move from one area of the world to another, and thus it is important for ESOMP systems around the world to be coordinated in their spectrum use. O3b encourage Ofcom to bear this in mind when developing its UK-based ESOMP regulations.

**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.

**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.

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

Yes.

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O3b again thank Ofcom for the opportunity to provide input via this Consultation, and appreciate being able to help shape the UK's policies and regulations towards ESOMPs.