

Question 1: What is your response to this consultation?:

O3b Limited ("O3b") is a UK satellite operator and an active participant in Ofcom's consultations, as Ofcom addresses the issue of how best to "secure the optimal use for wireless telegraphy of the electro-magnetic spectrum" [Ofcom's duties as set out in the Communications Act 2003, Section 3(2)a]. Most recently, O3b offered a response to Ofcom's "Framework for Spectrum Sharing" (October 2015).

O3b duly notes that the regulations proposed in this Notice are the end result of a 15 year process, begun in 2000 when Ofcom first auctioned the spectrum under consideration. However, O3b feels obliged to reiterate that over those 15 years, high-throughput satellite services of vital importance to the UK and the world have come to fruition and are flourishing, enabling access to broadband communications in every part of the globe as well as in the UK. More pertinently, during those 15 years Europe chose to dedicate a portion of this 28 GHz band to uncoordinated satellite earth stations [ECC/DEC/(05)01] which grew organically into the more recent CEPT decisions on earth stations on mobile platforms ("ESOMPs") [ECC/DEC/(13)01 for GSO systems, and ECC/DEC/(15)DD for non-GSO systems]. (Ofcom itself was the first to enact the necessary regulations to adopt this decision into its own regulations, in its "Statement on the Authorization of Earth Stations on Mobile Platforms," issued 20 January 2014.) The rest of the world is following suit, as satellite technology is increasingly capable of providing highly-sought-after mobility and ubiquity for broadband services. Furthermore, the ITU is considering ESOMP regulations for 29.5-30 GHz band. In short, the Ka band is an excellent fit for emerging broadband technologies.

Although these 28 GHz spectrum licences may have fit the UK's needs 15 years ago, the UK has an opportunity to adjust and tailor this regime, to allow the UK the flexibility to more fully take advantage of the cutting-edge satellite technology that the rest of Europe and the world enjoy already. O3b encourages Ofcom to reconsider UK Footnote 207 in its Frequency Allocation Table, to allow full access to the bands 27.5-30.0 for coordinated earth stations in the Fixed Satellite Service. In doing so, Ofcom would lay the groundwork for adopting regulations for uncoordinated earth stations across the whole of the band 28.4445-28.9485 GHz (in accordance with ECC/DEC/(05)01).