

Your response

Question	Your response
<p>Question 1: Do you agree with our proposal to update the Earth Station Network Licence to include a new provision authorising NGSO maritime services in the territorial seas of the UK and the Crown Dependencies? If you do not agree, please explain your reasons.</p>	<p>GSOA welcomes Ofcom’s proposal to update the Satellite Earth Station Network (ESN) licence to include a new provision explicitly authorising NGSO maritime services in the territorial seas of the UK and the Crown Dependencies.</p> <p>Recognizing that there is a growing demand for improved maritime broadband and that existing NGSO license holders are planning to offer a wide range of services and to roll out maritime terminals, GSOA applauds Ofcom’s proposal to allow access to Ku band (14.0-14.5 GHz) and Ka band (27.5–27.8185 GHz, 28.4545– 28.8265 GHz, and 29.5–30 GHz) by both NGSO and GSO systems under the same license conditions.</p> <p>We note, however, that certain parts of the 28 GHz band (i.e. 27.8285-28.445 GHz and 28.2365-29.4525 GHz frequency bands) are licensed to four UK terrestrial mobile operators, resulting in the fragmentation of the Ka-band spectrum. GSOA encourages Ofcom to follow an authorization approach which would allow satellite operators to obtain access to a contiguous block of spectrum to boost innovation in satellite network technologies and meet consumers’ growing demand for satellite connectivity.</p> <p>With reference to Ofcom’s recent decision to accept Arqiva’s 28GHz spectrum access license variation request, GSOA respectfully asks Ofcom to allow the reauthorization of the returned unused frequencies (27.8285-28.0525 GHz paired with 28.8365-29.0605 GHz) in the geographic areas where Arqiva’s rights have been rescinded and reduce the current segmentation of the 28 GHz band.</p> <p>On spectrum efficiency grounds, GSOA further encourages Ofcom to reconsider the current use of spectrum assigned to other terrestrial players and allow FSS in the entire Ka-band, in case they only lightly use the assigned spectrum blocks. We note that Ofcom followed a similar approach for the Ku-band and recently decided to double the capacity available for the provision of satellite services, extending the ESN license in the 14.25-14.5 GHz in view of the decreasing number of fixed links in the UK.</p>

Question 2: Do you agree with our proposal to introduce a licence condition in relation to NGSO downlinks to protect GSO satellites, and earth stations communicating

GSOA agrees with Ofcom's proposal to add into the ESN license a new condition in relation to the NGSO satellite downlinks to terminals located within the UK (para. 3.23 *et seq*, p. 12 of the Consultation). Such requirements are in line with existing equivalent power-flux density (epfd) limits set in Article 22 of the ITU Radio Regulations, which are intended to protect GSO satellites.

with GSO satellites? If you do not agree, please explain your reasons.

Question 3: Do you agree with our proposal to introduce a licence condition setting out requirements for the protection of radio astronomy from harmful interference in relation to NGSO downlinks? If you do not agree, please explain your reasons.

GSOA agrees with the proposed amendments to ensure protection of radio astronomy in the 10.6-10.7 GHz band from potential interference caused by space-to-Earth downlinks of NGSO systems operating in adjacent frequency bands.

<p>Question 4: Do you agree with our proposal to introduce licence conditions setting out requirements for the protection of fixed links from harmful interference in relation to NGSO downlinks? If you do not agree, please explain your reasons.</p>	<p>GSOA agrees with Ofcom’s proposal to introduce licence conditions for the protection of fixed links against harmful interference in relation to NGSO downlinks in accordance with Article 21 of the ITU Radio Regulations.</p>
<p>Question 5: Do you have any additional comments regarding any of our proposals?</p>	<p>GSOA wishes to raise an additional comment concerning the geographical boundaries of the ESN licence (para 3.43, p. 15 of the Consultation).</p> <p>GSOA notes that the proposed amendment concerning the extension of the ESN licence to offshore installations which are outside UK territorial sea but in waters which are to be treated as if they were situated in the UK under Section 120(2) of the Wireless Telegraphy Act 2006, is drafted in a way that could be interpreted to apply to ESIMs installed on non-UK flagged vessels sailing in waters around energy and oil platforms outside the UK territorial sea.</p> <p>GSOA therefore respectfully asks Ofcom to clarify that Part b) is not applicable in case of ESIM terminals on non-UK flagged vessels/aircraft. This is also in view of Article 56 and 58 of the UN Law of the Sea https://www.un.org/depts/los/convention_agreements/texts/unclos/part5.htm</p>

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