Your response

Question	Your response
Question 1: Do you agree with our initial conclusion that fixed wireless services are the highest value alternative use for each of the 10, 28 and 32 MHz bands? If not, please provide evidence to support your answer.	Confidential? – N **Introduction** Amazon plans to launch and operate Project Kuiper, a constellation of 3,236 non-geostationary ("**NGSO**") satellites in low earth orbit ("**LEO**") that will provide high-speed, low-latency broadband services to households, businesses, and other customers, connecting unconnected and under-connected communities around the globe. NGSO fixed-satellite service ("**FSS**") systems can provide high-capacity, low-latency connectivity to hard-to reach places. The Kuiper satellite constellation will operate in the 27.5 - 30 GHz frequency band (the "**28 GHz band**") for earth to space operations. For NGSO FSS systems to access the parts of the 28 GHz band in the United Kingdom (the "UK"), they must enter into a commercial arrangement with an existing spectrum access licensee. As such, Ofcom's decisions in respect of the annual licence fees ("**ALFs**") for the 28 GHz band not only impact the direct licensees of the spectrum, but also satellite operators. Amazon therefore thanks Ofcom for the opportunity to respond to this consultation. Amazon's comments in this response pertain only to the 28 GHz band. Amazon generally agrees with Ofcom's expectation set out at section 3.12 of the consultation statement that the growth of Ka-band LEO NGSO FSS satellite services means that use of spectrum will increase in the 28 GHz band.
Question 2: Do you agree with our initial conclusion that there is likely to be excess demand for each of the 10, 28 and 32 GHz bands in future, if cost-based fees were applied and that therefore an AIP fee is appropriate? If not, please provide evidence to support your answer.	Confidential? – N The 28 GHz band is used by multiple kinds of technology, including fixed wireless access fixed links ("**FWA**") and satellite systems and their associated ground infrastructure. Ofcom has stated its expectation that satellite use will grow into the future and that the 28 GHz band is a core band for such services (as noted in Ofcom's "Enabling mmWave spectrum for new uses" consultation dated 9 May 2022). To encourage

	investment and innovation by the satellite industry, Amazon encourages Ofcom to apply a predictable fee structure for use of the 28 GHz band that solely permits the recovery of administrative costs. Such an administrative cost-based fee is appropriate for spectrum access for FSS NGSO systems and geo-stationary networks, where spectrum is shared between different systems
Question 3: Do you agree with our proposed market value for the national 10, 28 and 32 GHz spectrum? If not, please provide evidence to support your view.	Confidential? – N No comment.
Question 4: Do you agree with our proposed calculation of the regional 28 GHz ALFs set out in detail in Annex A6, including our proposed calculation of fees for specific locations in part of a region? If not, please provide evidence to support your view.	Confidential? – N Ofcom's rationale for calculating the 28 GHz ALFs applicable to specific locations in part of a region is a reasonable approach. However, the location-specific ALFs only cover 6 of the 13 existing teleports in the UK and do not cover greenfield teleport development. Amazon requests Ofcom confirm why the 7 remaining existing teleports are not included in its location-specific ALFs. Further, Ofcom should consider creating a mechanism where new location-specific ALFs could be predictably calculated and imposed under spectrum access licenses for greenfield sites.
Question 5: Do you agree with our initial conclusion that fees set based on our estimate of market value will best meet our statutory duties?	Confidential? – N **Importance of Ofcom's statutory duties** It is important for Ofcom to meet its statutory duties when setting ALFs for spectrum licences, as Ofcom has outlined in sections 4.4 and 4.5 of the Ofcom consultation statement (i.e., securing optimal use of spectrum, furthering interests of citizens and consumers, encouraging investment and innovation, and promoting competition). Amazon recommends that Ofcom consider how its proposed ALF decisions will impact the users of the spectrum who must enter into commercial arrangements with spectrum access licensees. Predictable fees that are based on administrative cost-recovery will not unfairly penalise satellite

	operators as spectrum is shared between different systems, and will encourage efficient spectrum sharing and access by multiple operators in the 28 GHz band.
Question 6: Are there any other comments that you wish to make in respect of the proposals that we make in this consultation?	Confidential? – N **Availability of 28 GHz guard bands** In Ofcom's Space Spectrum Strategy consultation, Ofcom noted that there are four 28 MHz guard bands in the 28 GHz band which are currently not authorised for any use. In light of the complexities of accessing the 28 GHz band, as noted above, it would be beneficial for operators for Ofcom to make the 28 GHz guard band frequencies available for satellite earth station use on an Ofcom administered basis upon application by licenced operators.