

Consultation response form

Your response

Question	Your response
<p>Question 1: Do you agree with the proposed updated text in relation to WRC decisions? If not, please specify which item you disagree with and provide reasons for your response.</p>	<p>Confidential? – N</p> <p>We agree with the proposed updated text in relation to decisions taken at WRC-19 and WRC-23.</p> <p>We note the section on Non-GSO orbital tolerances, paragraphs 2.59 to 2.62, does not reference <i>resolves 7</i> of Resolution 8 (WRC-23), so would suggest this could be captured in an additional paragraph.</p>
<p>Question 2: Do you agree with the proposed updated text in relation to a) clarifications to our role and satellite leasing, b) space sustainability, c) No. 4.4 of the Radio Regulations and d) applications for UK2.1 frequencies? If not, please specify which part you disagree with and provide reasons for your response.</p>	<p>Confidential? – N</p> <p>a) We agree with the proposed updated text that clarifies Ofcom’s role in the case another administration requests to use a UK-licensed satellite to bring into use their frequency assignments. We would suggest also including details (such as timelines) of the opposite scenario, in which a UK operator seeks to use a satellite licensed by another administration to bring into use UK frequency assignments.</p> <p>b) We fully support the proposed updated text to encourage all applicants to adhere to best practices and relevant guidelines on space sustainability.</p> <p>c) We agree with the proposed updated text on No. 4.4 of the Radio Regulations.</p> <p>d) We welcome the clarifications provided by the proposed updated text on applications for UK2.1 frequencies. It would be helpful if Ofcom could also provide guidance on the expected processing times for such requests (as provided for Advance Publication Information and Request for Coordination applications in paragraphs 7.6 and 7.7, respectively).</p>

<p>Question 3: Do you have any additional comments on areas of our Procedures which you consider need updating, e.g. to provide additional clarity or to deal with factual errors or omissions? If so, please explain which areas and the reasons for your response.</p>	<p>Confidential? – N</p> <p>We note that paragraph 5.5 states that the deliverables set out in Table 1 “are required for both non-planned and planned bands”. We would suggest that the text could also clarify the requirements for Advance Publication Information (API) submissions as compared to Request for Coordination submissions. This is on the</p>
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	<p>basis that the deliverables described under Stage 2 may be accomplished on significantly shorter timescales than accounted for in Table 1 for API submissions, for example if an operator was to build their own small satellites and/or work with a Ground Station as a Service provider.</p> <p>This clarification would also be useful in the context of paragraph 2.50, which states that “for assignments which do not require coordination under Section II of Article 9, the notification procedure for space stations can generally be initiated upon the completion of the API procedure”. Our experience has been that Ofcom would prefer the notification procedure to be initiated after a satellite has been launched and its final orbital parameters confirmed. Confirmation of this aspect would be helpful for operators to anticipate Ofcom’s cost recovery charges for satellite filing work.</p>

Please complete this form in full and return to SatelliteFilingsUpdates@ofcom.org.uk.