

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>Confidential? – N No comment.</p>
<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 with GSO satellites? If you do not agree, please explain your reasons.</p>	<p>Confidential? – N No comment.</p>
<p>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.</p>	<p>Confidential? – N No comment.</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.

Confidential? – N

Amazon agrees with Ofcom's proposal to require NGSO satellite operators to protect fixed links based on compliance with the power-flux density ("PFD") limits in Article 21 of the Radio Regulations, as set out in proposed new condition 3.8(q).

However, Amazon requests clarification with respect to the proposed new condition 3.8(r), which obligates NGSO FSS satellites operating in the space-to-Earth direction to "not cause undue (or harmful) interference to fixed links" and provides that "compliance with the relevant power flux-density limitations referred to in 3.8(q) will not release licensees from this obligation." We request Ofcom clarify that an NGSO FSS system with operations in accordance with the Article 21 PFD limits is considered "permissible" interference within the meaning of the Radio Regulations and, therefore, will not be considered "harmful" interference to FS. As such, there is no need to impose condition 3.8(r), nor is there a need to refer to "undue" interference to FS links. We also note that "undue" interference is not a defined term in the Radio Regulations.

Question 5: Do you have any additional comments regarding any of our proposals?

Confidential? – N

Updates to licence application requirements

Ofcom has proposed that any person applying for an ESN Licence must provide the following information:

“Please provide evidence that your service can protect other services operating in cofrequency or adjacent bands.”

Amazon assumes that Ofcom would only be seeking information in respect of:

- services in adjacent bands to, or operating on a co-frequency basis in, the bands the proposed system would operate in; and
- scenarios where an NGSO operator would otherwise be obliged to protect such services.

Amazon requests that Ofcom provide further detail in the NGSO licensing guidance to clarify the information it is seeking from applicants.

Amazon further queries what evidence Ofcom would accept in response to the request above, and would suggest that self-certification be one method available for licence applicants. If Ofcom would not permit an applicant to rely on selfcertification, then applicants should be able to rely on an ITU favourable finding recorded in the Master International Frequency Register.

Access to certain parts of the 28 GHz band

Amazon recognizes that certain parts of the 28 GHz band (i.e., 27.8285-28.445 GHz and 28.236529.4525 GHz) are licensed to terrestrial mobile operators. We encourage Ofcom to take efforts to allow satellite operators to obtain access to these frequencies to boost innovation in satellite network technologies and meet customers’ growing demand for satellite connectivity.