

## 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</p> <p>Yes, Rivada Space Networks agrees to the proposed extension to maritime services in the territorial seas. We see this update as a clarification of the applicability of the network license and share Ofcom’s assessment that this is in the best interest of all stakeholders.</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.

Confidential? – N

Rivada Space Networks shares Ofcom's assessment stated in 3.18 that "In principle, the international regulatory framework should protect against such instances of harmful interference occurring." It is therefore not immediately evident, that additional provisions need to be introduced in the NGSO licence. We acknowledge Ofcom's intention to take "swifter, more direct action" if actual interference does occur. Efficient processes to resolve interference issues will benefit all parties involved and should always start at the operator level. In most cases they will be resolved directly without the need to involve the competent authorities. To this end, we understand the Ofcom proposal as an attempt to introduce an additional safeguard to assure swift resolution of cases that may not be resolved at the inter-operator level while remaining consistent with and strictly subsidiary to the established international rules, namely the ITU Radio Regulations. As the proposed new licence condition in sub section 3.7 refers directly to Article 22 of the ITU Radio Regulations these conditions are met.

As a future applicant for an Earth Station Network licence in the UK we are committed to work closely with Ofcom and all the existing and future operators of services in the Ka-band on workable and efficient solutions that enable interference-free coexistence.

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.

Confidential? – N

Rivada Space Networks agrees with the proposed licence conditions and fully acknowledges the need to protect radio astronomy from harmful interference.

<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>Confidential? – N</p> <p>The proposed new licence condition for sub section 3.8 q refers to Article 21 of the ITU Radio Regulations and is therefore consistent and subsidiary to the established international framework. But 3.8 r goes beyond the Article 21 compliance requirements with the relevant power-flux density limitations. Rivada Space Networks therefore asks Ofcom to more clearly and explicitly specify how “undue (or harmful) interference to fixed links” is defined in this case.</p> <p>While protecting existing users is of course a necessity, the most efficient arrangement for the future use of spectrum would be to allow FSS in the entire Ka-band and re-farm terrestrial fixed links to other suitable frequency bands.</p>
<p>Question 5: Do you have any additional comments regarding any of our proposals?</p>	<p>Confidential? – N</p> <p>The proposed update to the application form in 3.46 states “Please provide evidence that your service can protect other services operating in co-frequency or adjacent bands”.</p> <p>Rivada Space Networks welcomes Ofcom’s declared aim to reduce the risk of having to ask for further information after the consultation period. Our understanding of the term “evidence” in this context is that applicants demonstrate how they intend to implement measures to protect services operating in cofrequency and adjacent bands. Providing hard evidence at the stage of applying for the license will be difficult and should consequently not be a pre-condition for obtaining a licence.</p>

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