

## Consultation response form

Please complete this form in full and return to [ngso.licensing@ofcom.org.uk](mailto:ngso.licensing@ofcom.org.uk).



## Your response

Question	Your response
Question 1: Do you anticipate this satellite network will pose coexistence challenges to existing services?	<p>Is this response confidential? – <del>Y</del>/ N (<del>delete as appropriate</del>)</p> <p>Mangata Edge Ltd. has claimed that the lookaside mitigation measure is well suited to avoid interference with the existing NGSO satellite system licensed in the UK.</p> <p>As a satellite operator planning to launch its own NGSO constellation under the 3ECOM-1 and 3ECOM-3 ITU filings in the near future and also offering services in the UK our main concern is the scalability of the lookaside approach (<input type="checkbox"/> see answer to Question 2).</p>

Question 2: Are the measures set out by the applicant to enable coexistence with future systems reasonable?

Is this response confidential? – ~~Y~~/N (~~delete as appropriate~~)

In section 3.2 of Annex 1 to its application Mangata Edge Ltd. states “...to be confident about the possibility of arriving at required coexistence with such future NGSO systems by deploying lookaside.”

We do of course understand that Mangata Edge Ltd. neither can nor has to provide individual assessments on potential future coexistence with all future NGSO systems published by the ITU, or even for the most prominent ones. What is possible however is to provide an estimate regarding the scalability of the lookaside approach, i.e. the number of NGSO constellations that may coexist free of interference when applying the lookaside mitigation technique. This number will most likely be finite and could consequently affect future competition.

Mangata Edge Ltd. remains rather vague when outlining the available alternative approaches – “namely avoidance of overlapping frequency bands and use of opposite polarisation” – for achieving coexistence with a larger number of NGSO satellite operators providing services in the UK. The only evaluation given is “Such techniques have been proposed by other administrations for achieving coexistence. Deployment of such techniques will require close cooperation of the operators concerned and will have to be documented in coordination agreements.” (p. 14).

As a start-up operator and applicant for a NGSO network licence in the UK we ask Ofcom to require Mangata Edge Ltd. to provide more information regarding the expected difficulties and solutions on potential co-existence issues when applying either avoidance of overlapping frequency bands or opposite polarisation.

We expect this information to be relevant in Ofcom’s assessment process and a valuable insight for all NGSO operators, existing and potential new-entrants.

<p>Question 3: Do you believe this application would benefit or harm future competition between NGSO services in the UK? Please provide details.</p>	<p>Is this response confidential? – <del>Y</del>/ N (delete as appropriate)</p> <p>Rivada Space Networks firmly believes in the benefits of market mechanisms and competition to offer UK users more choice and affordable prices. However, this can only function properly when the methodology to mitigate harmful interference maximises the number of systems that can co-exist. A valid assessment of the competition effects is only possible, once Mangata Edge Ltd. has provided the additional information that we ask for in our answer to Question 2.</p>
<p>Question 4: Do you have any additional concerns or comments regarding this application?</p>	<p>Is this response confidential? – Y / N (delete as appropriate)</p>