Consultation response form

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

Consultation title	Rivada Space Networks GmbH
Full name	[redacted]
Contact phone number	[redacted]
Representing (delete as appropriate)	Organisation
Organisation name	Viasat
Email address	[redacted]

Confidentiality

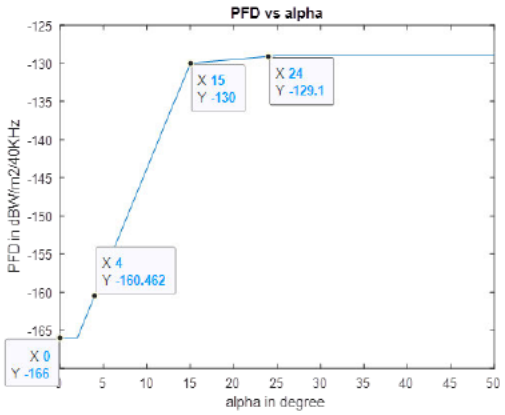
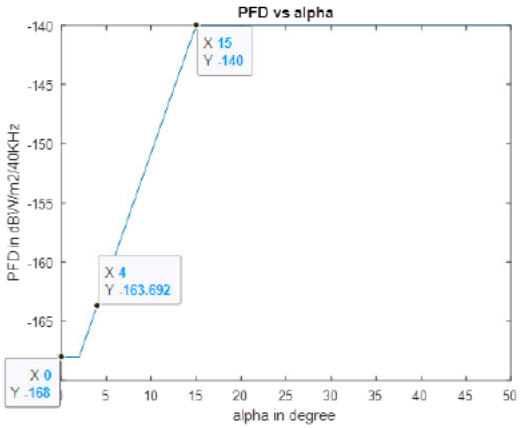
We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see Ofcom's General Privacy Statement.

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Nothing
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None
For confidential responses, can Ofcom publish a reference to the contents of your response?	N/A

Your response

Question	Your response
Q1. Do you anticipate this satellite network will pose coexistence challenges to existing services?	For co-existence with GSO FSS, Rivada has declared that their systems system fully complies with the equivalent power flux-density (EPFD) limits in Article 22 of the ITU Radio Regulations (RR), which states that NGSO systems shall not cause unacceptable interference to GSO networks. We welcome this declaration of Rivada. However, we invite Ofcom to evaluate compliance across the UK and not only rely on the ITU worst case

	geometry test. We also look to Ofcom to confirm that the aggregate EPFD levels produced by all operating co-frequency NGSO FSS systems comply with the limits in RR Resolution 76 and to guide Rivada and other NGSO operators licensed to provide service in the UK to ensure their compliance with these limits.
Q2. Are the measures set out by the applicant to enable coexistence with future systems reasonable?	The measures described in the application, i.e. the use of lookaside, avoidance of overlapping frequencies, and use of opposite polarisation, will help to enable coexistence with future NGSO systems.
Q3. Do you assess that the measures put forward will allow this satellite network to coexist with other services?	With regard to protection of GSO FSS networks, as mentioned above, we invite Ofcom to ensure that compliance with the Art. 22 EPFD limits is achieved across the UK independently of the worst case geometry. In addition, should Rivada submit new or modified filings or PFD masks to the ITU, the EPFD compliance should be re-checked to confirm that the limits are respected, not only at the worst-case geometry but also at other latitudes, in particular those covering the UK. The parameters provided in the ITU filing must be consistent, in particular the exclusion angle (alpha) for the protection of the GSO networks provided in the SRS database must be consistent with the PFD masks, as it is a key parameter for the ITU software checking the compliance with the Article 22 limits. The following figures show that the exclusion angle of 4° submitted in the SRS database is not consistent with the PFD masks in the Rivada ITU filings. *PFD vs alpha for the 18 GHz band:*

	 *PFD vs alpha for the 20 GHz band:*  In addition, since the number of UK NGSO licensees and applicants is currently five and likely to continue to grow, it is important for Ofcom to take measures to ensure that the aggregate EPFD limits defined in Resolution 76 are also met.
Q4. Do you believe the NGSO system in the application would benefit or harm competition between NGSO services in the UK? Please provide details.	We have no competition concerns with the application
Q5. Do you have any additional concerns or comments regarding the application?	Nothing at this time

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