O3b Limited ("O3b") submit their views on this Consultation as a member of the U.K. satellite and telecommunications industry. Since our response to the Draft Annual Plan for 2015/16, O3b's customer base has grown exponentially, using O3b's 12 UK-licensed satellites to provide ultrafast broadband connectivity around the globe in emerging markets or remote and isolated areas to large enterprises, telcos, mobile network operators, and government users. In fact, O3b's specialized connectivity (via a non-geostationary, medium-Earth orbit constellation) has proven so desirable to these segments that O3b recently raised another USD460M (GBP315M) to finance the construction and launch of another eight satellites.

O3b are grateful for Ofcom's recognition at WRC-15 that satellite services such as our game-changing high-throughput service to underserved areas are of sufficient value to administrations globally at this time that the spectrum used for those services (the Ka band) will not be studied for possible use by terrestrial mobile services. Ofcom's representation of the UK satellite industry was crucial to the international decision to support harmonized global satellite services.

There is a strong relationship between the UK's preeminent international position and presence and its success in these and other domestic policy goals. This UK leadership at the international level - on spectrum issues generally and on satellite issues in particular - creates an environment in which Ofcom can better achieve its domestic policy goals for spectrum management. For example, high-throughput satellites which use the Ka band frequencies discussed at WRC-15 may be the best way to provide true geographic ubiquity for the broadband Universal Service Obligation (USO) especially in rural areas (see Consultation at §4.2 and §4.4).

Despite this essential support for satellite services on the international level, O3b are concerned that there are few if any Work Plans involving satellite spectrum in the Proposed Annual Plan. In light of Ofcom's duty to efficiently manage spectrum (see §1.4 of the Consultation), we hope that Ofcom will be able to continue the momentum garnered during WRC-15 to continue working diligently on several pertinent projects. For example, we hope that Ofcom will announce its responses to several Consultations held in 2015, such as the Strategic Review of Satellite and Space Science Use of Spectrum; the Proposed Changes to the Procedures for the Management of Satellite Filings; and the Framework for Spectrum Sharing.

O3b also hope that Ofcom will work with the satellite industry on Agenda Item 1.6 for WRC-19, which seeks to create regulatory certainty for NGSO satellite operators who wish to operate within the FSS allocations in the 37.5 - 39.5 GHz (space-to-Earth), 39.5-42.5 GHz (space-to-Earth), 47.2-50.2 GHz (Earth-to-space) and 50.4-51.4 GHz (Earth-to-space) bands. Currently, the regulatory environment that governs the NGSO use of the FSS allocations in those bands is so vague as to discourage development in the band. Ofcom's support for studies will be critical to stimulating investment growth in this band, consistent with Ofcom's duty to encourage a wide range of electronic communications services (see §1.4 of the Consultation), and also with Ofcom's duty to promote competition by having standards that ensure a level playing field for new entrants (see §3.1 of the Consultation).

In addition, O3b ask that in 2016 Ofcom prioritise implementation of the ECC Decision regarding NGSO Earth Stations on Mobile Platforms (ESOMPs), (ECC/Dec/(15)04). In 2013,

Ofcom were the first EU country to incorporate the related ECC Decision on the use of GSO networks by ESOMPs. O3b request that Ofcom issue a consultation on the use of NGSO constellations to provide service to ESOMPs, such as vessels at sea and transportable platforms, as soon as possible. O3b already has one major cruise ship customer that uses Southampton as a hub port for its cruises throughout Europe. The national adoption of ECC Decision (15)04 on NGSO ESOMPs is thus avidly awaited.

O3b believe the recently-concluded Memorandum of Understanding (MOU) between Ofcom and the UK Space Agency (UKSA) will aid in the oversight and regulation of the commercial communications satellite industry, which may be a unique service area that falls under the purview of both agencies. This kind of regulatory efficiency and transparency is important if the UK is to create the flexible and responsive regulatory environment necessary to attract and retain enough new space industry business to help the UK meet its goal of increasing its share of the international space industry to 10% by 2030.

Innovative space projects such as small-sats (cube-sats, nano-sats, or pico-sats) are being developed in almost innumerable new directions, which will challenge Ofcom's (and the UKSA's) procedures. O3b are aware, too, that the Science and Technology Committee of the House of Commons recently held inquiries regarding the 2015 National Space Policy, in anticipation of the new Civil Space Policy expected to be released in 2016. These Policies aim to support and expand upon the Space Innovation and Growth Strategy, and the follow-up Growth Action Plan, in a concerted effort to meet the UK's goal of having a space economy worth GBP40B by 2030. O3b trust that Ofcom have this Growth Agenda for the space industry in mind as they plan their proposed work for 2016/17.

Thank you for the opportunity to comment. O3b is grateful for Ofcom's support through the years, and hopes to continue this good relationship as we develop our next generation of satellite services.