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**VIA E-MAIL** to [annualplan@ofcom.org.uk](mailto:annualplan@ofcom.org.uk)

26 February 2015

Annual Plan Team  
Strategy, 3<sup>rd</sup> Floor  
Ofcom  
Riverside House  
2a Southwark Bridge Road  
London SE1 9HA

**Re: O3b Limited's response to Ofcom's consultation on its Draft Annual Plan 2015/16**

Dear Annual Plan Team:

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 2014, O3b has tripled its network size, and now has 12 UK-licensed satellites operating at the Ka-band (17.8-18.6, 18.8-19.3, 27.6-28.4, and 28.6-29.1 GHz) in a medium-Earth orbit. O3b provides ultrafast broadband connectivity with throughputs up to 1.6 Gbps per beam to large enterprises, telcos, mobile network operators, and governments in emerging markets worldwide.

O3b are proud to be a UK satellite operator, and are pleased to see the priority in A1.80-84 of this Call for Input for Ofcom to represent the UK at CEPT and WRC-15 meetings. Representation at these meetings is crucial to the harmonized international allocations necessary for global satellite service providers, which O3b and the UK's other major satellite operators all are.

However, O3b remain concerned that the Agenda Items 1.1 and 10 at WRC-15 will not appropriately address the requirements of existing spectrum users, specifically the UK's own satellite industry, for continued access to globally harmonized spectrum suitable for current and future operations. O3b hope that Ofcom continue to show awareness that the very different business models inherent in satellite systems (such as the planning and build-out timescales) are deeply affected by changes to spectrum allocations.

There is no doubt that there is renewed interest in non-geostationary satellite systems (NGSO), considering the flurry of activities in the last few months. In fact, one may say that the success of O3b played a major role in bringing attention to the advantages of NGSO systems. To that end, O3b is pursuing a future agenda item for WRC-19 in which it seeks to create regulatory certainty for NGSO satellite operators who wish to operate within the FSS allocations in the 37.5 – 51.4 GHz band. Currently, the regulatory environment that govern the NGSO use of the FSS allocations in the 37.5 – 51.4 GHz band is vague and greatly discourages development in the

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band. Obtaining Ofcom's support will be critical to stimulating investment growth in this band for the satellite industry.

O3b have been pleased with Ofcom's support for the ongoing work within the CEPT's FM44 for a recommendation on the use of NGSO networks by Earth Stations on Mobile Platforms (ESOMPs), and we ask that in 2015 Ofcom prioritise support for this recommendation, and adopt the recommendation for the UK as quickly as possible. O3b already has one major cruise ship customer that uses Southampton as a hub port for its cruises throughout Europe, and the adoption of this expected recommendation is avidly awaited.

Finally, O3b will participate in and closely monitor Ofcom's consultations on spectrum management and spectrum sharing, and we commend Ofcom on the transparency of its process. Newly created regulators in developing countries often look to more experienced regulators like Ofcom to emulate policy positions and best practices (such as holding public consultations in a transparent and balanced manner). As a company that deals with a great number of regulators around the globe, O3b is appreciative of a fair and impartial regulator such as Ofcom.

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.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. Pritchard-Kelly'.

Ruth Pritchard-Kelly  
Director, Regulatory Affairs  
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cc: Suzanne Malloy, Vice President Regulatory Affairs, O3b Limited