

**Title:**

Ms

**Forename:**

Ruth

**Surname:**

Pritchard-kelly

**Representing:**

Organisation

**Organisation (if applicable):**

O3b Limited

**Additional comments:**

O3b Limited ("O3b") submit their views on this Consultation as a member of the U.K. satellite and telecommunications industry with offices in Jersey. O3b is a U.K.-notified satellite system before the ITU via Ofcom, and our satellites are registered as UK "space objects" before the U.N. via the U.K. Space Agency. O3b operate a non-geostationary satellite system ("NGSO") using a medium-Earth orbit ("MEO") to provide very high speed broadband connectivity to emerging markets worldwide in the Ka band. O3b launched the first four satellites in their constellation in June 2013, under a U.K. Outer Space Act ("OSA") licence from the U.K. Space Agency, and O3b's second launch of four satellites is expected in March 2014. O3b appreciates Ofcom's invitation to comment on the Annual Plan for 2014/15, and hopes that the areas we have identified can be included in Ofcom's priorities and programme of work. O3b looks forward to working with Ofcom for many years, and we remain at your disposal should you have any questions or wish to discuss our views further.

**Question 1: Are there areas of Ofcom's overall strategic approaches and purposes, outlined in last years' annual plan that may need to change?:**

As an overall approach, O3b believes that Ofcom should clearly recognize in all of its spectrum-related policies and guidelines that it represents the "whole of the U.K." - explicitly including companies based in the Overseas Territories and Crown Dependencies. Section 1 of Ofcom's "Procedures for the Management of Satellite Filings" and Section 22 of the Communications Act 2003 make clear that it is Ofcom who submits applications to the ITU on behalf of the Overseas Territories, and the Crown Dependencies, which, in fact, may not have direct relations with the ITU, not being sovereign states, and must depend on Ofcom to represent their interests. O3b is grateful for Ofcom's support through the years, and hopes to continue this good relationship.

**Question 2: What are the issues and areas that should form Ofcom's priorities or major work areas in 2014/15?:**

As Ofcom is no doubt aware, the U.K.S.A. is also undergoing a series of consultations (under the auspices of the Space IGS <http://www.bis.gov.uk/ukspaceagency/what-we-do/space-and-the-growth-agenda/uk-capabilities-for-overseas-markets/the-space-innovation-and-growth-strategy> ). These Consultations are looking at how best to support the U.K. space industry in general, and the satellite communications industry is at the confluence of these two agencies (Ofcom and the U.K.S.A.). Improved coordination between these two agencies in the oversight and regulation of this specific industry should be a priority for 2014/15 (especially so as to be in synch with the UKSA's review during this same time period).

**Question 3: Are there any specific areas for deregulation or simplification in the coming year?:**

There is one particular area that could involve both deregulation and simplification: better coordination between Ofcom and the U.K. Space Agency over the regulation and oversight of satellite communications. The inter-agency relationship between Ofcom and the U.K.S.A. needs to be critically improved to better encourage growth in the U.K. satellite industry. While both agencies currently support the space and satellite industries in some aspects and fora, a deeper cooperation between these two agencies is needed to support U.K. companies and especially SMEs. The U.K. satellite industry deserves and requires a consistent and integrated approach between Ofcom and the U.K.SA if U.K. excellence in space, innovation and business is to be effectively promoted worldwide.