

## ESOA AND GVF RESPONSE TO OFCOM CONSULTATION: “Earth Stations on Mobile Platforms”

ESOA and the Global VSAT Forum (“GVF”) welcome the opportunity to respond to Ofcom’s consultation on Earth Stations on Mobile Platforms (ESOMPs).

ESOA is a non-profit European organisation established with the objective of serving and promoting the common interests of European satellite operators. The Association is the reference point for the European satellite industry, and today represents the interests of 25 satellite operators, manufacturers, and related sectors that deliver information communication services across the globe. See [www.esoa.net](http://www.esoa.net).

The GVF is a non-profit organisation established under the laws of the United Kingdom (“UK”) and is the leading voice of the international satellite community, comprising more than 200 members from every major region of the world and from every sector of the industry, including satellite operators, manufacturers, system integrators, and other service providers. See [www.gvf.org](http://www.gvf.org).

Several ESOA and GVF member companies are planning to offer ESOMP services in the Ka-band FSS frequencies in the near future.

Various ESOA and GVF members have contributed to the development of the new ECC Report and Decision related to the authorisation of ESOMPs in Europe, and we take this opportunity to thank Ofcom for the extensive contributions it has made over the past few years in support of the development of these two CEPT deliverables.

ESOA and the GVF accept and support the proposals made in this consultation document as a methodology for the UK authorisation of ESOMPs on land, on ships and on aircraft in association with GSO systems.

The regulations proposed by Ofcom in the current consultation are applicable to ESOMPs operating in conformance with CEPT Electronic Communications Committee (“ECC”) Report 184 and ECC Decision (13)01, which address the use of ESOMPs operating with geostationary orbit (“GSO”) FSS networks. At this point of time, there are no ETSI standards for non-geostationary (“NGSO”) ESOMPs, although such standards are currently under development including the identification of frequency bands that may be suitable for use by NGSO ESOMPs.

GSO ESOMP services are planned for commercial launch in the UK in early 2014, and hence we request that Ofcom implement the proposed procedures and any legislative changes as soon as possible.

We provide answers to the specific questions below.

### ***Question 1) Do you agree that Ofcom should authorise the use of ESOMPs in the UK in the frequency bands 27.5 – 27.8185 GHz, 28.4545 – 28.8265 GHz and 29.4625 – 30 GHz?***

ESOA and the GVF support that these bands be made available for GSO ESOMPs. Although the bands 27.8285-28.4445 GHz, 28.8365-29.4525 are licensed for terrestrial use in the UK, we agree that these frequencies, even though they are allocated to the FSS, should not be authorised for the operation of ESOMPs in UK territory.

***Question 2) Do you agree with Ofcom's proposal to exempt from licensing the establishment, installation and use of land-based ESOMP equipment that transmits in the frequency bands 27.5 – 27.8185 GHz, 28.4545 – 28.8265 GHz and 29.4625 – 30 GHz?***

ESOA and the GVF support this proposal in specific reference to ESOMPs associated with GSO satellite systems.

***Question 3) Do you agree that ESOMP equipment mounted on aircraft or ships should be licensed to transmit in the frequency bands 27.5 – 27.8185 GHz, 28.4545 – 28.8265 GHz and 29.4625 – 30 GHz using the existing Notice of Variation process?***

Alternative approaches to the authorisation of ESOMPs on ships and aircraft could, in specific reference to ESOMPs associated with GSO satellite systems, also be considered (e.g. licence exemption). However ESOA and the GVF are content with the method proposed by Ofcom, based on licensing and the Notice of Variation.

***Question 4) Do you agree with the proposed technical provisions given in the Draft Interface Requirement and Draft NoVs?***

ESOA and the GVF agree with the technical provisions in the Draft Interface Requirements and the Draft NoVs in specific reference to ESOMPs associated with GSO satellite systems.