
Intellect response to:

Ofcom Consultation on the Authorisation of Earth Stations on Mobile Platforms

This response was prepared together with UKspace and is
endorsed by UKspace

FINAL

Introduction

UKspace is the trade association of the UK space industry. Founded in 1975, its role and mission is to:

- Grow the UK's share of the global space market, by promoting the best commercial, political and public environment for the UK space industry
- Promote greater awareness in Government, the media, the public and other key stakeholders of the wide-ranging benefits from one of the UK's most innovative, high skilled, and value-adding sectors
- Provide the focal point for any organisation commercially involved in space systems and related services in the UK
- Provide the primary forum for industry dialogue with the UK Government and with other national and international stakeholders

UKspace is sponsored jointly by A|D|S (the trade body for the aerospace, defence and security industries) and Intellect (the trade body for the UK's technology industry).

www.ukspace.org

ADS is the premier trade organisation advancing the UK Aerospace, Defence, Security and Space industries. Farnborough International Limited (FIL), which runs the Farnborough International Airshow, is a wholly-owned subsidiary.

ADS has offices in England, Scotland, Northern Ireland, France and India with new offices planned in China and the Middle East. ADS was formed from the merger of the Association of Police and Public Security Suppliers (APPSS), the Defence Manufacturers Association (DMA) and the Society of British Aerospace Companies (SBAC) in October 2009. ADS also encompasses the British Aviation Group (BAG). Together with its regional partners, ADS represents over 2,600 companies.

www.adsgroup.org.uk

Intellect is the trade association that represents the voice of the UK's technology industry. We believe that a vibrant and successful technology sector is vital to the long term economic well-being of the country. We help companies of all sizes compete and

innovate in a dynamic global market. We represent the views of industry to government and regulators and also provide opportunities for government and regulators to interact with industry on key policy and market issues. Intellect has over 860 member companies including multinationals, mid-sized firms and small businesses. Collectively these companies directly employ more than half a million people in the UK and their products and services are used by every part of the UK and global economy. www.intellectuk.org

General Comments

We welcome the opportunity to respond to Ofcom's consultation on Earth Stations on Mobile Platforms (ESOMPs) for geostationary-satellite orbit (GSO) Systems.

A number of UKspace/Intellect member companies are planning to offer ESOMP services in the Ka-band FSS frequencies in the near future.

UKspace/Intellect accepts and supports 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. We provide answers to the specific questions below.

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.

Response to Specific Questions

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?

Intellect supports that these bands be made available for GSO ESOMPs. While the bands 27.8285-28.4445 GHz, 28.8365-29.4525 are licensed for terrestrial use in the UK, Intellect agrees 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?

Intellect supports 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, in specific reference to ESOMPs associated with GSO satellite systems, could also be considered (e.g. licence exemption). However Intellect is 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?

Intellect agrees with the technical provisions in the Draft Interface Requirements and the Draft NoVs in specific reference to ESOMPs associated with GSO satellite systems.