

**Inmarsat response to Ofcom consultation  
Licence Exemption of Wireless Telegraphy Devices: Proposed changes  
20 September 2011**

Inmarsat is pleased to respond to the Ofcom consultation document: "Licence Exemption of Wireless Telegraphy Devices: Proposed changes". Our comments are related only to the proposal to extend the licence exemption of Mobile Satellite System (MSS) terminals to the bands 1518 to 1525 MHz and 1670 to 1675 MHz.

Inmarsat supports the extension of the current licence exemption of L-band MSS terminals to cover the "extended L-band" frequencies: 1518-1525 MHz and 1670-1675 MHz. Inmarsat's current services operate in the adjacent or nearby frequency bands (1525-1559 MHz and 1626.5-1660.5 MHz). Inmarsat will launch the Alphasat satellite in early 2013 which will allow operation of MSS terminals in the UK on the extended L-band frequencies. The latest models of Inmarsat user terminals are already capable of operating in the extended L-band frequencies. Hence Inmarsat plans to start operations in the new frequency bands in Europe soon after the launch of Alphasat. The new frequency bands will support the full range of Inmarsat services, including low data rate SCADA applications, handheld mobile phones, transportable mobile broadband terminals and vehicle mounted terminals. Maritime and aeronautical applications, while not within the scope of the current consultation will also operate in the extended L-band frequencies.

While the uplink frequencies that may be used on Alphasat include the band 1668-1670 MHz, these frequencies would not be assigned in the UK, in accordance with ECC Decision ECC/DEC/(04)09. This would provide a reasonable balance of constraints on MSS operations while adequately protecting the radio astronomy service.

We generally agree with and support Ofcom's proposals to modify the licence exemption regulations as proposed but offer some comments on the detail of the proposals below:

- We note that the band 1518-1525 MHz is also available for PMSE, which has the potential to cause interference to receiving mobile earth stations which would operate in the same frequency band. Given this potential risk, we seek that, to the extent possible, Ofcom minimises use of the band 1518-1525 MHz for PMSE, for example by giving preference to the use of alternative frequency bands.
- We generally agree with the proposed modifications to IR 2016 contained in Annex 6 to the consultation document. However there appears to be an inconsistency insofar that section 4.7 of the consultation document proposes to limit the transmit power density to 37 dBW e.i.r.p., whereas the maximum transmit power density shown in Annex 6 is 33 dBW e.i.r.p. for equipment conforming to EN 301 444, and is 15 dBW e.i.r.p. for equipment conforming to EN 301 681. For equipment conforming to EN 301 444, Inmarsat would be content with a maximum transmit power of 33 dBW e.i.r.p.
- Also referring to the proposed new tables shown in Annex 6 of the consultation document, we note that Ofcom proposes to add a new remark: "Ofcom may impose additional restrictions on the maximum power used for specific frequencies and

locations". This remark is not included in the current version of IR 2016 and hence we question whether it is needed in the proposed new version. As far as Inmarsat is aware, no additional constraints are necessary and in any case it is not clear how any additional constraints could be applied except through a future modification of IR 2016. This remark may therefore not be necessary and should be reviewed.

- We note that ETSI standard EN 301 426 for low data rate terminals is referenced in the current IR 2016 and we propose that reference to this standard should be retained in the new IR 2016, in addition to the proposed references to EN 301 444 and EN 301 681. Terminals compliant with the EN 301 426 standard will continue to operate in the band 1525-1559 MHz and 1626.5-1660.5 MHz.

Inmarsat thanks Ofcom for the opportunity to comment on these proposals and requests that our comments be taken into account when finalising the new regulations and modifications to IR 2016. We would be pleased to discuss further the above points or any other issues related to these new regulations with Ofcom.

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