Title:

Mr

Organisation

EUMETSAT

Additional comments:

In general, EUMETSAT appreciates the plans of OFCOM to introduce the concept of RSA for MetSat receive-only Earth stations in the frequency bands 1690 – 1710 MHz and 7750 – 7850 MHz in order to grant and ensure a certain level of protection to the reception of meteorological data from MetSat satellite systems.

EUMETSAT (with the UK as an important member country) through its current and future planned non-geostationary and geostationary MetSat systems provides important meteorological data in those frequency bands to mainly public/governmental entities in the UK such as the UK MetOffice.

The continuous availability of meteorological data to those entities is of outmost importance for the weather prediction and therefore of direct societal and economical benefit to the UK.

It should be noted that WRC-12 will conclude upon an extension of the MetSat allocation at 7750 – 7850 MHz to also cover the band 7850 – 7900 MHz. It is therefore proposed to extend the applicability of the RSA regulations to also cover the band 7850 – 7900 MHz, as future non-geostationary MetSat systems of EUMETSAT and other MetSat operators will provide meteorological data in this band to users in the UK.

Question 1: Do you agree with the list of proposed RSA parameters for assessing interference and for setting fees for receive-only earth stations? Are sufficient parameters defined for a grant of RSA? If you disagree, please give your reasons and suggest alternatives.:

The proposed RSA parameters for the MetSat bands as outlined in paragraph 4.12 and 4.13 are acceptable although the antenna gain towards the horizon of 10dBi could be slightly increased. Only the coordination distance for the L-Band of 60km is considered to be too low as typical separation distances for this band would be more in the order of 60 - 90km. Thus, the coordination distance for the L-Band should be in the order of 90km.

Question 2: Do you agree with the proposals for introducing fees for RSA for receive-only earth stations in the bands concerned on the basis of parity with existing PES fees (with a minimum fee of £500) and that the full fees be implemented from the date of grant of RSA? If you disagree, please give your reasons and suggest alternatives:

For the MetSat bands 1690 – 1710 MHz and 7750 – 7850(7900) MHz the introduction of a fee is not considered useful as the MetSat Earth stations are usually operated

by the UK MetOffice and the military which in reality would result in a transfer of funds between public sectors. For other entities such as universities, other research facilities or private/amateur users planning to operate a MetSat Earth stations, the introduction of a fee could have even a detrimental effect/impact.

Furthermore, since the number of MetSat Earth stations in the UK is very low, the introduction of a fee cannot be considered as a measure to improve the efficient use of the spectrum by the MetSat Earth stations as the use of the MetSat bands is already optimised in terms of bandwidth and number of Earth stations.

Question 3: Do you agree that grants of RSA in the bands should normally be on a rolling annual basis, with a 5-year revocation period?:

On this aspect it should be taken into consideration that a MetSat satellite system and with this the corresponding Earth stations are operated over a lifetime of 20 or more years with usually a follow-on system succeeding the currently operational system. Thus, the use of the MetSat bands is long-term and therefore the period for which RSA is granted should be long-term and in relation to the lifetime of the MetSat system. Given the above a 5-year revocation period is considered not to be appropriate.

Question 4: Do you agree that grants of RSA in the bands should be tradable and that grants of RSA and WT licences should be inter-convertible? If so, do you agree with our proposal to model the process for trading and conversion on that for RSA for radio astronomy? :

Since it is considered that the introduction of a fee for RSA in the MetSat bands is not appropriate given the reasons outlined under question 2, the concept of tradability and conversion should also not apply for the MetSat bands.

Given the permanent use of the MetSat bands by a low number of Earth stations operated by public sector entities with a prime interest in the long-term protection of those Earth stations the concept of tradability and conversion is of no use.

Question 5: Do you agree with our proposed procedure for considering applications for the grant of RSA to receive-only earth stations. If you disagree, please give your reasons and suggest alternatives? :

The proposed procedure is acceptable when comments under question 1 are taken into consideration in the assessment of the RSA application.

Question 6: Do you agree that RSA for receive-only earth stations could provide greater security against interference and help promote optimal use of the 1690 - 1710, 3600 - 4200 and 7750 - 7850 MHz bands? If not, please explain why and describe any alternative mechanism that you consider to be necessary.:

RSA for receive-only Earth stations in the MetSat bands 1690 – 1710 MHz and 7750 – 7850(7900) MHz could improve the level of protection and could provide a certain

level of long term security against interference when the area of protection is properly selected (see response to question 1). The effect of RSA as a mechanism to promote optimal use of those bands is considered relatively low given the consistently small number of MetSat receive-only Earth stations.

Also the impact of granting RSA to those few MetSat Earth station sites on the deployment of the fixed service in that area is very limited as only a subset of the overall number of channels of an FS band could not be used. Thus, there will always be a number of FS channels in any given area that could be assigned without being impacted by an area for which RSA is granted. In this context paragraph 4.65 and 4.66 can only be considered as an exceptional worst case when the real FS demand would result in congestion of the remaining available FS channels. In such a case alternative FS bands could be used in those areas.