

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title:

Recognised Spectrum Access ("RSA") for Receive Only Earth Stations in the Bands 1690 – 1710 MHz, 3600 – 4200 MHz and 7750 – 7850 MHz

To (Ofcom contact): RSAconsult@ofcom.org.uk ; SPG Space Services

Name of respondent: Ann Vandembroucke

Representing (self or organisation/s): Inmarsat

Address (if not received by email):

CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing

☒

Name/contact details/job title

☐

Whole response

☐

Organisation

☐

Part of the response

☐

If there is no separate annex, which parts?

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

DECLARATION

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☐

Name Ann Vandembroucke

Signed (if hard copy)



16 September 2010

SPG Space Services
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Email: RSAconsult@ofcom.org.uk

Inmarsat response to: Recognised Spectrum Access (“RSA”) for Receive Only Earth Stations in the Bands 1690 – 1710 MHz, 3600 – 4200 MHz and 7750 – 7850 MHz

Sir,

Inmarsat thanks Ofcom for the opportunity to input to the above named consultation regarding the application of RSA to the bands 1690 – 1710 MHz, 3600 – 4200 MHz and 7750 – 7850 MHz. Inmarsat wishes to take this opportunity to provide comment on the general policy issue raised regarding the scope of applicability of RSA instruments – specifically its application to shared frequency bands.

Inmarsat operates a mobile satellite service (MSS) in bands exclusively used by the MSS. We note that the bands under review for RSA are shared by multiple services. Further, we understand from references both within the consultation document¹ and the accompanying document² that sharing is considered as a pre-qualification requirement for the application of RSA – and would not serve any purpose in bands used exclusively by a single service. Moreover, the application of RSA to such MSS bands would imply an unnecessary additional layer of regulatory complexity and cost to Inmarsat without conferring any associated benefits in terms of spectrum protection.

In Ofcom’s response to the consultation inputs, we ask for confirmation that RSA will not be applied to the exclusive MSS bands and that no proposal on that matter will be forthcoming in the future.

Regards,



Ann Vandenbroucke
Director Policy & Regulatory Affairs

¹ References to sharing in the consultation document: 2.25 ‘The three receive-only earth station bands being considered in this consultation are all shared with terrestrial point-to-point microwave radio links.’. 4.57: ‘The specific ways in which bands covered by this consultation are shared by other services is explored further below.’. 4.58: ‘In this band, satellite services have historically shared with terrestrial point-to-point links in the fixed service.’

² Workshop on RSA (Recognised Spectrum Access) for receive-only earth stations 22 July 2010.