Monday, 27 September 2010

SAP REG RESPONSE TO OFCOM RSA CONSULTATION

On 8 July 2010, Ofcom published a consultation document soliciting comments on its proposal to apply Recognised Spectrum Access (RSA) to receive-only earth stations in the bands 1690 – 1710 MHz, 3600 – 4200 MHz and 7750 – 7850 MHz.

As Ofcom is aware, SAP REG, ESOA, the GVF and their individual members have consistently expressed grave reservations over proposals to apply RSA to the commercial satellite sector. We have taken the position from the outset that RSA is unnecessary and would introduce a disproportionate and unnecessary burden on satellite users to the detriment of the entire satellite industry and, most importantly, to millions of users of satellite services in the United Kingdom and in Europe.

SAP REG agrees that steps needs to be taken to ensure that terrestrial facilities in the UK, especially those providing mobile services, will not cause unacceptable interference to existing receive-only earth stations. In our view, Ofcom should ensure this through coordination between the parties concerned. It is unclear in the consultation document, however, whether Ofcom has this intention. For reasons elaborated in the ESOA response (attached), SAP REG believes strongly that ensuring this protection does not require and should not include commercial tradability or conversion to licence elements.

Ofcom's July 2010 proposal would apply RSA to a subset of current commercial satellite operations in the UK. This application would represent the first intrusion of the RSA concept into the satellite industry. As such, SAP REG remains seriously concerned over the broad implications of the concept as applied in this proceeding and in general.

SAP REG fully supports the ESOA submission (as attached) in response to this Ofcom consultation and the detailed points made therein.

Note : SAP REG members include Aeromobile, Alcatel-Lucent Mobile Broadcast, Avanti Communications, Boeing, EADS Astrium, ESOA, Europa-Max, Eutelsat, France Telecom, GVF, Globalstar, Hispasat, Hogan Lovells International, Hughes Network Systems, ICO Global Communications, Inmarsat Ventures PLC, Intelsat, ISI, Iridium, LightSquared, Mobile Satellite Ventures L.P., MSUA, ONDAS Media, ONDE Numérique, ROSE Vision, SES, Solaris Mobile, Squire Sanders, Thales Alenia Space, Telespazio, Terrestar, Thuraya and WorldSpace.