Question 1: Do you have any comments on our proposals to
- include additional milestones to provide evidence that the satellite project is
on-going and that its frequency assignments will be brought into use within
the seven year regulatory period
- clarify what evidence we will accept to demonstrate milestones have been
completed, and
- set specific deadlines for milestones?
Do you have any comments on how these changes are worded in the proposed
revised Procedures? :

We oppose any changes that may make the existing system more complex if there are no benefits from the changes

Question 2: Do you have any comments on our proposals to clarify the
information required when there is a change to the business plan?
Do you have any comments on how these changes are worded in the proposed
revised Procedures?:

We are opposed to supplying any additional information where the changes are only minimal

Question 3: Do you have any comments on our proposed changes to the
reporting requirements illustrated in paragraphs 4.18 ? 4.25 above?
Do you have any comments on how these changes are worded in the proposed
revised Procedures?:

We agree with the provision of this information

Question 4: Do you have any comments on our proposal that a request for
notification under No. 11.41 must be supported by evidence of efforts to
coordinate with the other operator(s)/administration(s)?
Do you have any comments on how these changes are worded in the proposed
revised Procedures?:

We agree with the proposal

Question 5: Do you have any comments on our proposal to clarify the
Procedures to set out that we may, at our discretion, allow UK satellite
networks with junior filings to be notified to the ITU without requiring
completion of all frequency coordination with UK networks having senior
filings, and the conditions on which we would proceed with notification in
such cases?
Do you have any comments on how these changes are worded in the proposed
revised Procedures?:

We agree with the proposal

Question 6: Do you have any comments on our proposal to change the text of the Procedures to clarify that, in order to make the declaration of bringing into use for GSO networks, we may require a range of information from the operator, including that set out in CR/343?
Do you have any comments on how these changes are worded in the proposed revised Procedures?:

We consider that this proposal is unclear and could cause uncertainty in the process

Question 7: Do you have any comments on our proposals that, for non-GSO systems, operators are asked to indicate, at CR/C stage, the minimum number of satellites needed to be deployed in order to provide the intended service to at least the declared minimum quality of service, and that this information (i.e., the minimum number of launched satellites) is used to verify that the system has been brought into use?
Do you have any comments on how these changes are worded in the proposed revised Procedures?:

We agree with the proposal though it might be useful to include the minimum number of satellites in the filing information.

Question 8: Do you have any comments on our proposal to include provisions in the Procedures for the transfer of an application at API stage, subject to certain conditions being met?
Do you have any comments on how these changes are worded in the proposed revised Procedures?:

We agree with the proposal

Question 9: Do you have any comments on our proposals to set out the requirements on operators and the consequent actions that we may take in cases where assignments are no longer in use?
Do you have any comments on how these changes are worded in the proposed revised Procedures?:

No comment