

## **Additional comments:**

The Communications Commission is supportive of the work done by Ofcom in representing the Isle of Man's satellite interests and thanks Ofcom for the opportunity to provide feedback. In responding to this Consultation, the Commission is primarily concerned with situations where an Isle of Man filing will potentially be suspended or cancelled by Ofcom, or transferred or relinquished at the behest of an operator. The Commission is requesting that Ofcom (as it normally does) consults with the Commission prior to such actions taking place. The Commission's comments on the specific questions that seem to involve potential suspension, cancellation, transfer or relinquishment of a filing are set out below.

**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? :**

With respect to proposed changes to Ofcom's due diligence requirements in Section 5 of the Procedures, the Commission would like to be consulted in situations where Ofcom is considering the suspension or cancellation of an Isle of Man filing.

**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?:**

See answer to Question 1.

**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?:**

See answer to Question 1.

**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?:**

No comment.

**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?:**

No comment.

**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?:**

No comment.

**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?:**

No comment.

**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?:**

The Commission notes that the proposed change is only to Paragraph 11.1 of Section 11. However, the Commission would like to take this opportunity to request that Section 11 is further changed to include a requirement for Ofcom to consult with the Isle of Man (or the relevant Crown Dependency or Overseas Territory) before agreeing to a request to transfer a filing to or from an Isle of Man operator.

**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?:**

The Commission notes that the substantive proposed change to Section 12 is the addition of Paragraph 12.z. However, the Commission requests that Section 12 is further changed to include a requirement that the Isle of Man (or the relevant Crown Dependency or Overseas Territory) is consulted before a request by an operator to relinquish an Isle of Man filing is agreed, or if Ofcom is considering the suspension, reassignment or cancellation of an Isle of Man