

Question	Your response
<p>Question 1: Do you agree we have identified the most relevant cost drivers to take account of in our charging approach?</p>	<p>Confidential? –N Yes. Although activities related to satellite filings have many other drivers and key aspects to be taken into account, the cost drivers identified by OFCOM are the most relevant and suitable to develop a fair cost recovery analysis.</p>
<p>Question 2: Are there any other factors you consider we should take account of in our charging approach? Please explain why in your response.</p>	<p>Confidential? – N No.</p>
<p>Question 3: What comments, if any, do you have on our charging options 1-4?</p>	<p>Confidential? – N</p> <p>Option 1: Oneoff charge per filing. We do not favor this option as charges using this approach would be difficult to estimate as costs will vary greatly from filing to filing.</p> <p>Option 2: Application fee plus flat annual fee per filing. This approach is reasonable, but the use of a flat annual fee still fails to take into account the filing differences during coordination process. This could result in inaccurate and unfair charges.</p> <p>Option 3: Application fee plus weighted annual fee per filing type. We support adoption of this approach as it will provide for a set fee with additional costs that reflect the type of filing being made. This approach will result in OFCOM being able to recover its costs from the parties that incur them.</p>

	<p>Option 4: Hourly rate. We do not support the use of this approach for a variety of reasons. While it would arguably cover costs, it would be administratively burdensome for staff to comply with. In addition, the fees charged would, in part, depend on the expertise of the staff member(s) who are working on the filing.</p>
<p>Question 4: What other charging options, if any, do you believe we should consider?</p>	<p>Confidential? – N None.</p>
<p>Question 5: Do you agree that our preferred charging option, option 3, is the best way to meet our objectives? If no, please state your preferred charging option and explain why.</p>	<p>Confidential? – N Yes. We support this option as it provides an ability to capture the different amounts of time to prepare and advance ITU filings based on the complexity of the satellite filing.</p>
<p>Question 6: Do you have any comments on our proposed charging approach (as set out above)?</p>	<p>Confidential? – N Regarding the weighting factor for the Notification request, we think that there is no rationale to justify that a Notification request will generate more workload than a regular CR/C. We suggest to use a factor of 1.0. This will properly consider the work done by OFCOM on the treatment of a Notification request.</p>
<p>Question 7: Do you have any comments on our proposals for implementing our charging approach?</p>	<p>Confidential? – N We support the proposal for implementing the charging approach, but urge OFCOM not to apply this new approach to ITU satellite filings submitted before the implementation date.</p>
<p>Question 8: Do you have any other comments on matters arising from this consultation?</p>	<p>Confidential? – N No.</p>