

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</p> <p>Yes</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</p> <p>Ofcom state that they propose to treat modifications the same as a new filing submission (with associated charges). We would like clarification as to whether this simply means applying the submission fee or whether it is also intended to apply an annual charge. Whilst we support the application of a submission fee, we believe that no additional annual charges should apply since it could lead to the situation where one operator submitting a large filing containing multiple frequency bands will have only one annual charge fee levied, whereas an operator submitting two small filings for the same network, with potentially fewer frequency bands, would have more than one annual fee levied.</p>
<p>Question 3: What comments, if any, do you have on our charging options 1-4?</p>	<p>Confidential? –N</p> <p>Options 1 and 2 do not differentiate between the complexity of filings and their associated workload and therefore the weighting of costs between operators would not be spread fairly.</p> <p>Options 3 and 4 would be the most equitable. Option 3 gives greater clarity on costs and would enable operators to budget more easily. However, we would like to see in place a mechanism whereby the weighting between the different categories may be reviewed occasionally such as on the trigger of new rules from ITU which may impact on the workload associated with a particular type of filing.</p>
<p>Question 4: What other charging options, if any, do you believe we should consider?</p>	<p>Confidential? –N</p> <p>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</p> <p>Yes.</p>
<p>Question 6: Do you have any comments on our</p>	<p>Confidential? –N</p>

proposed charging approach (as set out above)?

Ofcom has advised that an annual fee will be applied to a filing up until notification. We would like to seek Ofcom clarification on this point, i.e. is Ofcom's interpretation of this:

- i) Up to ITU regulatory deadline; or
- ii) Up to the point at which the BR either suppresses the filing or removes the CR/C (which is a later date than regulatory deadline and can be considerably later depending on BR workload); or
- iii) The point at which an operator has submitted a notification covering all frequency bands; or
- iv) The point at which an operator has submitted a notification and has informed Ofcom that it does not intend to bring into use any remaining frequency assignments within the filing; or
- v) A combination of any of the above.

We would not like to see ii) applied since this could create uncertainty for operators and we believe i) should only apply in the case where an operator has not submitted any notification at all.

The current proposed satellite filing charges do not take into consideration the complexity or size of the CRs for both the GSOs and the NGSOs. If possible, we would like to see those categories broken down to account for very small filings in either category which would not necessitate as much work.

Question 7: Do you have any comments on our proposals for implementing our charging approach?

Confidential? –N

For accounting purposes, some operators will require an invoice from Ofcom in order to be able to pay for any new notice submissions (API/CR/Notifications), and therefore they would not be able to comply with the requirement for payment to accompany new submissions without obtaining an invoice from Ofcom in advance. For this reason, we would prefer to see payment for new notices to be included in the annual invoices, rather than at the point of submission. When submitting their notices, operators could simply make the commitment to pay for all submissions as they already do today in respect of ITU cost

	<p>recovery. We believe this approach would ensure that there are no unnecessary delays in notice submissions due to any accounting difficulties.</p> <p>We would like the publication of satellite filings charges on Ofcom's website to also include clarification on which filings will be subject to the annual management charges, and at which point annual charges will cease to apply.</p>
Question 8: Do you have any other comments on matters arising from this consultation?	Confidential? –N No