

Question	Your response
<p><b>Question 1: Do you agree we have identified the most relevant cost drivers to take account of in our charging approach?</b></p>	<p>The costs drivers are mostly clear, however the allocation methodology highlighted does not differentiate between those directly involved in the processing of a satellite filing, and more general costs of work undertaken by the satellite filing team (e.g. policy work) which may or may not have direct benefit to the filing entities. It is unclear whether the Total Costs assumed in 5.38 include the latter or not.</p>
<p><b>Question 2: Are there any other factors you consider we should take account of in our charging approach? Please explain why in your response.</b></p>	<p>The consultation rational focuses almost completely on the costs associated with the filing process and does not identify nor consider any of the wider benefits to the UK economy satellite filings and the associated downstream services bring. As highlighted in 3.4 of the consultation document the Government's objective is to grow the UK space sector to 10% of global market by 2030. Creating a businessfriendly regulatory environment, particularly for start-ups and new entrants will contribute greatly to this objective. The proposal does not identify the impacts, either positive or negative, the proposed changes will have on achieving this objective.</p>
<p><b>Question 3: What comments, if any, do you have on our charging options 1-4?</b></p>	<p>While great consideration is given to weighting in proportion with the cost bases associated with types of filings, which is fair and proportionate, little consideration is given to the means of a filing entity to pay these fees (only briefly addressed in 5.29 and 5.30). Even for the simpler filings, these fees could prove large barriers to entry to start-ups, newentrants and non-commercial entities, restricting satellite delivered services to incumbents. As stated on Ofcom's Website on the About Us page "Our duties come from Parliament. Our priority is to look after you, and we sometimes do this by promoting competition among companies we regulate.". Within this there should be scope for adjusting charging options in order to enable new entrants, new services and healthy competition. Options could include an element</p>

	<p>of allowances for means testing the fees, or options for deferment of payment, or more favourable payment terms, helping to alleviate one of the largest issues for start-ups and innovation projects – cash-flow, which would be heavily affected due to the long lead times associated with a satellite filing, meaning these costs come very early in the lifecycle.</p>
<p><b>Question 4: What other charging options, if any, do you believe we should consider?</b></p>	<p>See deferred payment above.</p>
<p><b>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.</b></p>	<p>Out of the proposed options, Option 3 is the most preferred, however further consideration should be given to the impacts on new-entrants or smaller businesses.</p>
<p><b>Question 6: Do you have any comments on our proposed charging approach (as set out above)?</b></p>	<p>As highlighted in Q3, further consideration should be given to the implications for smaller business and new entrants dismissed in Section 5.29 and 5.30, including evaluating when in the business/project lifecycle these costs fall.</p>
<p><b>Question 7: Do you have any comments on our proposals for implementing our charging approach?</b></p>	<p>Overall, greater consideration should be given as to how Ofcom is helping (or hindering) the Government achieve the objective stated in 3.4 of the consultation document, to grow the UK space sector to achieve 10% of global market by 2030, including ensuring the UK remains a competitive regulatory environment compared to its peers.</p>
<p><b>Question 8: Do you have any other comments on matters arising from this consultation?</b></p>	