

Question 1: Do you agree we have identified the most relevant cost drivers to take account of in our charging approach?

Confidential? – N

ViaSat considers that Ofcom is best placed to identify the relevant cost drivers relating to the management of satellite filings, and therefore consequently considers:

- Spectrum policy projects and programmes
- Spectrum engineering and enforcement
- International membership
- ICT
- Property and common costs

to be the relevant drivers.

Viasat also understands and accepts that the costs associated with spectrum policy projects and programmes, and spectrum engineering and enforcement cover Ofcom's activity relating to the management of satellite filings, including:

- Submitting new filings
- Managing filings (ITU process)
- Notifying filings
- Maintaining notified filings
- Dealing with *ad hoc* requests (for filings going through the ITU process) and
- Undertaking project work relating to satellite filings.

However, we request that in order to consider all aspects of this consultation effectively, Ofcom should provide further clarity on how the costs are apportioned.

For example, Figure 2 in the consultation document provides a breakdown of average satellite filing costs by type and show that a total of 54% (GBP 578k) of costs are attributable to International Membership, ICT, and property and other common costs. We would like to better understand how these costs are apportioned. Are they apportioned by group (e.g. Space and Science, Spectrum Group) or by the number of individuals employed by Ofcom and apportioned according to the numbers of employees working on the management of satellite filings?

	Viasat considers that further clarification is necessary as different assumptions could result in significantly increased costs for satellite operators on an annual basis depending on Ofcom's workload in this area.
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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>Confidential? – N</p> <p>Viasat considers that in any given CEPT or ITU cycle the amount of project work required by Ofcom to support a specific type of satellite filing can vary significantly. By way of example, for WRC-19, Agenda Item 1.4 focusses on planned satellite bands, and Agenda Item 7 has a large focus on the procedures relating to NGSO networks.</p> <p>It is therefore possible that in any given study cycle, filings for one type of satellite network or service could compensate the project work required to support filings for another type of satellite network or service.</p> <p>We consider that it would be fairest if Ofcom applied annual fees directly related to the amount of work undertaken in support of a given filings, or at least filings types. In this scenario there would be one fee for example for unplanned FSS GSO, and another for unplanned FSS NGSO, etc.</p> <p>We fully appreciate that increased granularity in calculating annual costs may attract increased administrative costs, however, given that this level of granularity is easily provided by almost all project management and billing platforms, this increased cost and complexity associated with implementing such a framework should be minimal.</p>
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<p>Question 3: What comments, if any, do you have on our charging options 1-4?</p>	<p>Confidential? – N</p> <p>ViaSat believes Options 4 is the fairest option, and Option 3 is the next fairest option.</p> <p>We do not consider that Option 4 should be a significantly more costly or complex Option to implement.</p> <p>We do consider that Option 3 provides a higher degree of certainty of likely annual costs but we are unable with the information provided in the consultation document to determine whether this offsets potential savings associated with option 4 and, therefore, request that Ofcom provide greater granularity into how each option was investigated.</p>
<p>Question 4: What other charging options, if any, do you believe we should consider?</p>	<p>Confidential? – N</p> <p>Depending on the outcome of analysis we would like to perform, taking account of the information requested in our response to Question 3, we consider that the fairest, most cost effective, and least complex option to implement, providing clarity and certainty for stakeholders could be either:</p> <ul style="list-style-type: none"> • Option 4 • Option 3, or • A mixture of Options 3 and 4
<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>As described in response to Questions 3 and 4 above, we consider that we are unable to determine the cost effectiveness of Option 4 based on the information provided in the consultation document and request that Ofcom provides greater granularity and detail in how each option was assessed.</p> <p>We consider that of Options 1 to 3, Option 3 is the most appropriate.</p>

<p>Question 6: Do you have any comments on our proposed charging approach (as set out above)?</p>	<p>Confidential? – N</p> <p>Viasat understands the value of advance payment of annual payments fees.</p> <p>A potential impact of a single payment date is that operators may time their CR/C or notification requests around this date to maximise the time before a first payment is due. Similarly operators may submit notification requests immediately before the year end date eliminating any fees relating to the management of CR/C filings the following year.</p> <p>This may result in higher number of requests being submitted in April/May timeframe, and Viasat considers that any increased workload on Ofcom should not result in a drop in Quality of Service provided.</p>
<p>Question 7: Do you have any comments on our proposals for implementing our charging approach?</p>	<p>Confidential? – N</p> <p>It is our understanding that the notification charge includes both initial notification request (Part1 S) and subsequent resubmissions (as necessary). Could Ofcom please confirm?</p>
<p>Question 8: Do you have any other comments on matters arising from this consultation?</p>	<p>Confidential? – N</p> <p>None</p>