

Your response

About Intelsat:

Intelsat is the world's leading provider of fixed-satellite services (FSS), delivering high performance connectivity applications for the past 50 years covering more than 99% of the world's populated regions and serves a wide variety of customers in the UK, from large telecommunications carriers and broadcasters to corporate networks and Internet service providers. Intelsat is intending to grow its already strong presence in the UK (we are already a large exporter of satellite services from the UK) engaging with UK Government to build on the Government's commitment to enable broadband for at least 95% of UK residents using satellite solutions and employs a highly skilled workforce in its London office (directly contributing to the UK work force in space technology as outlines in the recent UK Space Agency report)¹

Intelsat welcomes the opportunity to respond to the Ofcom Proposed Annual Plan 2019/20 and offers the following insights for the consideration of Ofcom.

In conjunction with the consultation for the Ofcom Proposed Annual Plan 2019/2020, Ofcom issued several consultations with related topics. For example, public consultation on 3.6-3.8 GHz band auction and shared use of 3.8-4.2 GHz band are relevant to the same industry stakeholders. Responding to multiple consultations on inter-related topics may be difficult for the industry, not only due to limited time due to simultaneous deadlines but also before responding one may require a level of prejudgement on the outcome of the other(s). Therefore, it is helpful to have a clear forward plan of consultations so that we can plan resources to respond to Ofcom's proposals.

However, we see this opportunity to review and comment on Ofcom's proposed Annual Plan for 2019/20 as a vital step, since this is an indicator to Ofcom's priorities which helps us be informed and engaged. We therefore look forward to continuing to work constructively and collaboratively with Ofcom, on the key elements we have highlighted below:

Broadband Universal Service Obligation (USO): *Ofcom will implement a broadband universal service obligation. In particular Ofcom will: designate one or more Universal Service Providers to deliver the service; establish the obligations that Universal Service Provider must meet to deliver the scheme in accordance with the legislation; and determine how the costs incurred by a Universal Service Provider may be compensated. In implementing the USO, our objectives are: to deliver the USO as quickly as possible, so consumers benefit as soon as possible; to ensure any designated provider can deliver services that meet the USO requirements; and to ensure the cost of delivery, and therefore impact on industry and consumers, is minimised.*

With regards to Ofcom plans to implement broadband Universal Service Obligation (USO), Intelsat would like to highlight that satellites today play an important role in meeting the requirements for the broadband USO in the UK. Satellite technology is one of the most quick and cost-efficient ways to reach rural and remote areas. Intelsat believes that a mix of technologies is necessary to meet

¹ <https://www.gov.uk/government/publications/uk-space-industry-size-and-health-report-2018>

the broadband USO requirements, including both low earth orbit (LEO), medium earth orbits (MEO) satellites for providing low latency and geostationary (GEO) satellite solutions for providing wide coverage in an affordable manner for less time-sensitive applications.

Spectrum Sharing: *Explore opportunities to maximise efficient use of the spectrum, by opening up spectrum access to new players and businesses where spectrum is not being used, through increased sharing where appropriate. Initial focus on: - Opening up access to additional users in the 3.8-4.2GHz, 2.3GHz and 1800MHz guard band. - Third Party Access to Mobile Spectrum We will confirm our approach, including consideration of the appropriate authorisation mechanism and fees.*

While Intelsat agrees with Ofcom that spectrum sharing should be promoted as means to maximise efficient use of spectrum, Intelsat considers that spectrum sharing should be done in a manner that safeguards the current and future usage of the bands by the existing users. An opportunity to one industry stakeholder should not be made at the expense creating regulatory uncertainty or unnecessary restrictions to others.

In addition to the bands mentioned by Ofcom in their annual plan, there is the frequency band 14.25-14.5 GHz where an opportunity to increase the efficiency of spectrum use by allowing satellite technology to provide aircraft earth stations (AES) services to share the spectrum with fixed service to provide gate-to-gate services to various UK based airlines. Allowing the shared use of this 250 MHz spectrum band eases the rapidly increasing need for in-flight connectivity. This is directly in line with the UK's strategic objective to promote in-flight connectivity (IFC) services due to the UK being home to the busiest airport in Europe and a country with a large amount of aviation industry.

World Radiocommunications Conference (WRC-19): *Working closely with Government, Ofcom will engage with UK stakeholders and European partners to develop UK and European regional positions to take into the World Radio Council -19 with the aim of achieving outcomes which are best aligned with UK interests.*

With regards to the WRC-19 work, Intelsat would welcome a more open approach from Ofcom to allow stakeholders to bring across and defend their views on WRC-19 Agenda Items internationally, especially for Agenda Items where there are no controversial views within the UK stakeholders. Intelsat has been actively promoting an Agenda Item proposal for the Agenda of the WRC-2023 on operation of earth stations on aircraft communicating with geostationary space stations in the fixed-satellite service in the frequency band 12.75-13.25 GHz (Earth-to-space). The Agenda Item proposal is based on the European framework (ECC Decision) being developed in CEPT under Work Item 34, which was supported by Ofcom. Intelsat considers that promoting this European framework into a globally harmonised approach for earth stations on aircraft would benefit the administrations as well as both aviation and satellite industries. The Agenda Item proposal will be discussed in the next meeting of CPG PTA in April 2019. Support from Ofcom for this Agenda Item would be highly appreciated.