

Your response

Question	Your response
<p>Question 1: Do you agree with the prioritisation of the agenda items, as shown in Annex 5, and if not why?</p>	<p>Yes, except for Agenda Item 10, which should be elevated from Low to High priority given the impact this Agenda Item will have on defining the issues under discussion for WRC-27.</p>
<p>Question 2: What are your views on the continued need to protect global aeronautical and maritime services, in the 4.8 – 4.99 GHz band, under this agenda item?</p>	<p>No comment.</p>
<p>Question 3a: Do you agree that the UK interest in the bands 3 600-3 800 MHz and 3 300-3 400 MHz in Region 2 (North & South Americas) should be limited to any impacts on UK operational use in those areas?</p>	<p>No comment.</p>
<p>Question 3b: Do you agree that the UK should maintain its objections to changes to the regulatory environment for the band 3300-3400 MHz (in Region 1, Europe, Africa, Middle East), noting UK has interests in use of radar for both ground and airborne operations?</p>	<p>No comment.</p>
<p>Question 3c: What is your view on the use of 6425-7025 & 7025-7125 MHz, and what evidence do you have to support this view? How does that inform your views on a IMT identification in these bands?</p>	<p>There is a general use of Mobile Satellite Service (MSS) feeder links in the downlink direction in the 6700-7075 MHz frequency band in operation including our network.</p> <p>We recommend a “No Change” approach in these bands and the suppression of the Resolution 245 (WRC-19) to protect these feeder link operations.</p>
<p>Question 3d: What are your thoughts on the current UK view that IMT should not be identified in Region 2 in the band 10-10.5 GHz in order to ensure the protection of the globally operating EESS (active) systems and airborne & vessel mounted radars?</p>	<p>No comment.</p>

<p>Question 4: Do you agree that, where no additional technical limitations are placed on mobile services, the UK can support an upgrading of the mobile allocation, in 3600 - 3800 MHz, from secondary to primary?</p>	<p>No comment.</p>
<p>Question 5: What are your views on the development of regulatory conditions to facilitate deployment of high altitude IMT base stations in IMT identified bands below 2.7 GHz?</p>	<p>No comment.</p>
<p>Question 6: Do you agree that a formal modification to the Radio Regulations is not needed for fixed service applications that use IMT technologies?</p>	<p>We support Ofcom’s proposal that a formal modification to the ITU Radio Regulations is not needed for fixed service applications that use IMT technologies.</p> <p>In addition, WRC-19 Agenda Item 9.1, topic c and Resolution 175 (WRC-19) can be fulfilled by revising the existing ITU-R documents on this matter such as: Recommendations, Reports, Handbooks, etc., within the ITU-R Working Groups mandate.</p> <p>We urge Ofcom to support No Change and suppression of the Resolution 175 (WRC-19) for WRC-19 Agenda Item 9.1, topic c. Moreover, this topic must not be considered as a new Agenda Item for the WRC-27.</p>
<p>Question 7: What are your views on the proposed approach for 470-694 MHz, recognising the national decisions already in place and taken for DTT multiplex licensing in the band, and the additional and supplementary spectrum made available for UK PMSE usage?</p>	<p>No comment.</p>
<p>Question 8: What are your views on the need to establish an international regulatory environment that provides adequate protection of UK fixed links from earth stations in motion, in the band 12.75 – 13.25 GHz, which is also practicable from an enforcement/implementation perspective?</p>	<p>No comment.</p>

Question 9: Do you agree that the UK continues to support the maritime distance figure for ESIMs that work to non-geostationary satellites and to test the other

No comment.

conditions agreed at WRC-19 for ESIMs working to geostationary satellites to ascertain whether these remain appropriate for non-geostationary satellites?

Question 10: What are your views on whether an allocation to inter satellite links is necessary for existing satellite allocated bands and whether this would provide benefits internationally?

We generally support allowing satellite-tosatellite operation through a fixed-satellite service (space-to-space) allocation where such operations use the “within the cone” concept as described in method B1 of the Agenda Item 1.17 CPM text. The resolution associated must be clear enough, so it provides protection to existing systems/networks operating in conformity with the Radio Regulations including our operations, which support a wide range of consumer, small business, enterprise, in-flight and broadband services through our fleet of Geostationary High-Throughput Satellites.

Question 11: What are your views on the need for additional satellite allocations in support of narrowband IoT “M2M” type applications, noting that there remains the continued use of PMSE for wireless cameras in the band 2010 – 2025 MHz?

While we support the need for additional spectrum for Mobile Satellite Service (MSS) on a global basis, we do not support any spectrum allocation for specific applications or limited to the exclusive use of operators providing narrowband IoT “M2M” type applications. Instead, additional MSS spectrum should be allocated to allow a broader variety of narrowband applications not limited by unnecessary technical constraints.

WRC-19 Agenda Item 1.18 couldn’t make progress at the ITU-R study cycle previous to the WRC-23 due to the ambiguity of the language included in the Resolution 248 (WRC-19) and pre-defined limits included in its *recognizing c*. There was no consensus or agreement even for the technical parameters and the operational characteristics.

We therefore support No Change and suppression of the Resolution **248 (WRC-19)** for WRC-19 Agenda Item 1.18.

Question 12: What are your views on the proposed approach to this agenda item concerning the fixed satellite service in 17.317.7 GHz in Region 2?

We support an allocation to the fixed-satellite service (FSS) in the space-to-Earth direction in the frequency band 17.3-17.7 GHz in Region 2. More spectrum is required to suffice the need of new FSS technologies for broadband applications.

Question 13a: On Topic B, what are your views on the post milestone procedures for non-geostationary satellite systems?

No comment.

Question 13b: On Topic L, what are your views on regulatory conditions for Telemetry, Tracking and Command (TT&C) for NGSO inorbit servicing?

No comment.

Question 13c: What are your views on the remaining topics currently listed for Agenda Item 7?

We are of the view that tolerances should be ample enough not to impose unnecessary burdens when deploying a system. We support a flexible approach to control key orbital parameters to provide sufficient margin for NGSO operations. This approach is based on the need to determine the allowable variances between the information recorded in the Master International Frequency Register (MIFR) and the actual operation of NGSO systems. While this view provides certainty of operation, Ofcom should also make sure this flexibility does not create contraventions that lead to NGSOs potential increase of interference or protection requirements.

Question 14: Noting that any UK position will be developed only after the ITU Plenipotentiary Conference, do you have any comments relating to the use of Article 48 that may be addressed at WRC-23?

No comment.

<p>Question 15: What are your views on the need to establish an international regulatory environment for sub-orbital vehicles, which at the same time does not limit flexibility of spectrum options, and retains international safety considerations?</p>	<p>No comment.</p>
<p>Question 16: Do agree that where the adjacent band compatibility issues are addressed and ICAO coordination processes are not compromised, that the addition of an aeronautical satellite (AMS(R)S) allocation to the band can be supported?</p>	<p>No comment.</p>
<p>Question 17: Do agree that functions related to international aviation safety are a matter for ICAO? On this basis, and absent any</p>	<p>No comment.</p>
<p>contrary information from ICAO, should the UK support the development of an international spectrum regulatory framework for UA use of FSS that would support efficient use of spectrum?</p>	
<p>Question 18: Recognising the recent diminishing industry interest in this item relating to possible modification of the aeronautical HF assignment plan, and the general lack of global interest, do you agree that UK move towards a No Change proposal under this agenda item?</p>	<p>No comment.</p>
<p>Question 19: What are your views on the need for additional spectrum, specifically in the 15 and 22 GHz bands, for non-safety aeronautical use?</p>	<p>No comment.</p>
<p>Question 20: What are your views on Agenda Item 1.11 and the proposed UK position to support modernisation of GMDSS?</p>	<p>No comment.</p>

Question 21: What are your views on the approach to the review of 1240-1300 MHz, recognising that discussions concerning future satellite navigational needs for the UK are a matter for Government?	No comment.
Question 22: What are your views on a new spectrum allocation in the 40-50 MHz range to support and enhance climate monitoring, such as, environmental shifts in ice sheets?	No comment.
Question 23: What are your views on upgrading the Space Research Service allocation, from secondary to primary, in the 14.8-15.35 GHz band?	No comment.
Question 24: What are your views on the potential for defragmentation in this band to facilitate both EESS (passive) use and provide for larger contiguous blocks for fixed & mobile allocations?	No comment.
Question 25: Do you agree that formal international recognition for Space Weather	No comment.

Sensors should be implemented in the Radio Regulations?	
Question 26: What are your views on the limits proposed to protect EESS (passive) under Agenda Item 9.1 topic d) and do you have any views on which of these limits might be accommodated in the Radio Regulations and how?	No comment.
Question 27: Do you agree that the formalised time reference in common global use, is not a matter of spectrum regulation?	No comment.
Question 28: Do you have any comments concerning the Standing Agenda Items, where not covered elsewhere in this document?	No comment.

<p>Question 29: Do you have a view on any of the footnotes to which UK is a party?</p>	<p>No comment.</p>
<p>Question 30: Are you aware of any specific issues, not covered elsewhere in this document, which are likely to be raised in this part of the Director's Report and of which you think Ofcom should be aware?</p>	<p>No comment.</p>
<p>Question 31: Do you have any comments on Agenda Item 9.3 considering Resolution 80?</p>	<p>No comment.</p>
<p>Question 32: What changes to the Radio Regulations have you identified that would benefit from action at a WRC and why? Do you have any proposals regarding UK positions for future WRC agenda items or suggestions for other agenda items, needing changes to the Radio Regulations, that you would wish to see addressed by a future WRC?</p>	<p>We request Ofcom to adopt the position that none of the frequency bands currently allocated to satellite services must be considered for a potential WRC-27 agenda item related to the allocation to the mobile service and/or new identifications for IMT systems. The latest debates on sharing and compatibility studies between IMT mobile systems and Satellite based systems have led to endless discussions on assumptions and scenarios that most of the time do not achieve consensus. This situation is not desirable to make regulatory changes that might affect the operation of any of the services sharing the band. Moreover, with the inclusion of satellite services into the 3GPP 5G family of standards, new satellite technologies could be integrated/interoperable with other terrestrial</p>
	<p>IMT based mobile services/applications. This new trend requires dedicated spectrum bands for both terrestrial and satellite components of IMT.</p>
<p>Question 33: What are your views on the use of IMT stations that use antennas that consists of an array of active elements, in bands shared with satellite services?</p>	<p>No comment.</p>