



COMMENTS OF TELESAT INTERNATIONAL

In response to:

Call for Input, 5G spectrum access at 26 GHz and update on bands above 30 GHz

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Telesat International Limited (Telesat International) welcomes the opportunity to respond to the Call for Input, *5G spectrum access at 26 GHz and update on bands above 30 GHz* (the “Call for Inputs”). Telesat International is a wholly-owned subsidiary of the global satellite operator, Telesat Canada. Telesat Canada’s satellite fleet provides coverage and connectivity solutions in C, Ku and Ka-band to meet the needs of broadcast, corporate, telecom and government customers around the world. Telesat International, a UK corporation, currently controls a number of Isle of Man ITU filings for three Telesat satellites – T12V, T18V (under construction) and T19 V (under construction). T12V currently serves, and T19V will serve, the UK. Telesat Canada also plans to deploy an advanced global low earth orbit (LEO) satellite constellation offering low latency, high throughput broadband services. It is envisaged that once implemented, Telesat’s LEO constellation will provide extensive benefits to UK consumers, including in particular to those who cannot access super-fast broadband through other existing or planned terrestrial technologies.

Telesat Canada agrees that the timely availability of spectrum will facilitate the development of 5G technologies. It is important to note, however, that 5G infrastructure will rely on a “network of networks” and the benefits of 5G will be fully realized by networking terrestrial 5G services with other infrastructure, including terrestrial fibre and Fixed Satellite Services (FSS). Thus satellite services will play a role in the delivery of 5G services.

While Telesat International has no specific comment on the issues raised in the Call for Inputs relating to 5G access to 26 GHz spectrum, it does wish to comment briefly on the roadmap¹ for other bands that are being considered for 5G use under WRC-19 Agenda Item 1.13.

Telesat is comfortable with the roadmap set out in the Call for Inputs, including in particular the bands currently identified for priority consideration for 5G access. However, as recognized in the Call for Inputs, 37.5 – 43.5 GHz has an international allocation to FSS and is an important

¹ Call for Inputs, section 7.

expansion band for satellite feeder links. Indeed, this band is already widely used in other jurisdictions for FSS. Telesat International therefore welcomes Ofcom's support for studying means to ensure that terrestrial 5G deployment in the 37.5-43.5 GHz band would co-exist with existing and future satellite use of the band.

Other bands that are being considered under WRC-19 Agenda Item 1.13, such as the 71-76 and 81-86 GHz bands, are also allocated to the FSS on a co-primary basis. While these bands are not currently being used extensively for satellite services, they are likely to be so used in the future. Accordingly, and in light of Ofcom's promotion of the adjacent 67-71 GHz band as another priority band for 5G², Telesat International requests that the 71-76 and 81-86 GHz bands not be considered by Ofcom for 5G, and that Ofcom oppose the identification of these bands for the future development of International Mobile Telecommunications (IMT) in the relevant international fora (such as CEPT and ITU).

All of which is respectfully submitted by Telesat International.

September 22, 2017

² See section 7.3 of the Call for Inputs.