

Your response

Question	Your response
<p>Question 1: Do you agree with our proposal to make this spectrum available for fixed links? Are there other potential users of these frequencies which we have not identified?</p>	<p>Confidential? – Y / N</p> <p>[Per Section A1.9 of the <i>consultation</i>, a commenter does not need to answer all the questions in the consultation]</p>
<p>Question 2: Do you agree with our proposal to make this spectrum available on an Ofcom-managed basis?</p>	<p>Confidential? – Y / N</p> <p>[Per Section A1.9 of the <i>consultation</i>, a commenter does not need to answer all the questions in the consultation]</p>
<p>Question 3: Do you agree that 28 and 32 GHz spectrum is broadly substitutable from a fixed links perspective? If not, please explain why this is the case and provide evidence to support your views. In particular we would be interested to understand any differences between the 28 and 32 GHz bands which could make them more or less suitable for fixed links migrating from the 26 or 40 GHz bands.</p>	<p>Confidential? – Y / N</p> <p>Amazon agrees that unassigned spectrum in the 28 and 32 GHz bands is broadly substitutable for fixed links. Further, Amazon respectfully urges Ofcom to adopt policies and procedures that would populate the unassigned spectrum in the 32 GHz band with fixed link licenses to allow more intensive use of the unassigned spectrum in the 28 GHz by satellite terminals.</p> <p>In its <i>Statement and consultation: increasing use of the 27.5–30 GHz band</i> (Published: 22 March 2024), Ofcom acknowledged that capacity in the 28 GHz band is needed for satellite services. The capability of many satellite communication networks to provide services (including continuity/redundancy services) to a variety of customers requires continued access to spectrum in the 28 GHz band. Moreover, Ofcom has stated its expectation that satellite use will grow and that the 28 GHz band is a core band for such services (as noted in Ofcom’s consultation <i>Enabling mmWave spectrum for new uses</i> (Published: 16 April 2024)). Amazon fully agrees with Ofcom’s expectation, noting that the Kuiper System makes use of the full Ka-band for satellite gateway stations, customer terminals (including ESIM), and telemetry, tracking, and command (TT&C) functions. As such, it is important that access to spectrum in the 28 GHz band can grow to meet the demands of satellite systems like Project Kuiper. Lastly, unlike spectrum in the 28 GHz band, the unassigned spectrum in the 32 GHz band may be better suited for fixed links as it does not share an international allocation with the fixed-satellite service (FSS), thus</p>

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	<p>making it less prone to interference issues between transmitting earth stations and receiving fixed stations. While cross-border coordination is an effective mitigation to co-frequency interference issues, avoiding the frequency overlap in the first instance can be a simpler approach to cross-border spectrum management.</p> <p>In light of these possible advantages and to accommodate the growing demands on the 28 GHz by satellite systems, Amazon respectfully urges Ofcom to develop policies and procedures that would (1) aim to populate the unassigned spectrum in the 32 GHz with terrestrial fixed links in substitution of the unassigned spectrum in the 28 GHz band, and (2) facilitate more intensive use of the 28 GHz band by satellite systems.</p>
<p>Question 4: Do you agree with our provisional proposal to make 28 MHz channels and one or more 56 MHz channels available for new fixed link assignments? If not, please explain the reasons for your view and set out any preferred alternative approach.</p>	<p>Confidential? – Y / N</p> <p>[Per Section A1.9 of the <i>consultation</i>, a commenter does not need to answer all the questions in the consultation]</p>
<p>Question 5: Do you have any additional concerns or comments regarding the proposals in this consultation document?</p>	<p>Confidential? – Y / N</p> <p>[Per Section A1.9 of the <i>consultation</i>, a commenter does not need to answer all the questions in the consultation]</p>

Please complete this form in full and return to 32GHz@ofcom.org.uk.