

Your response

Question	Your response
<p>Question 1: Do you have any comments on our assessment of the interference challenges raised by NGSO systems and their potential impact on a) service quality; and b) competition?</p>	<p>Confidential? – N</p> <p>Eutelsat, one of the world’s leading satellite operators, would like to thank Ofcom for sharing its proposal for an updated approach to licensing Non-Geostationary Satellites (NGSO) systems and for opening it for comments.</p> <p>Even though Eutelsat operates mainly geostationary satellites, Eutelsat wishes to express its concerns over the proposed NGSO licensing framework, because of its potential larger implication for satellite networks coordination.</p> <p>Eutelsat understands Ofcom thinks it is necessary to complement the International Telecommunications Unions (ITU) framework to deal with the potential interference issues between NGSO systems in the United Kingdom. The ITU coordination procedure should however not be set aside and be replaced by a national process that does not follow the ITU principle requiring later systems not to cause harmful interferences to earlier systems.</p> <p>Eutelsat would like to remind that the ITU framework provides a well-established, globally understood and accepted process for dealing with interference issues. Because of the impossibility to predict what future systems will look like, the ITU has decided to implement a procedure that asks later satellite systems to protect earlier systems. Thanks to this process, 99.95%¹ of spectrum assigned to satellite networks was free from harmful interference in 2019.</p> <p>Additionally, Ofcom states in paragraph 2.2 that NGSO broadband systems “may also create new challenges which we need to address”, and it is the purpose of this consultation. If Ofcom decides to pursue with the proposed licensing</p>

1. <https://www.itu.int/bestofwrs20/wp-content/uploads/sites/4/2021/05/WRS-20-Orbit-Spectrum-International-Regulatory-Framework.pdf>

	<p>framework for broadband NGSO systems, Eutelsat would therefore suggest that Ofcom explicitly restricts this framework to broadband NGSO systems and does not include other types of NGSO systems in the framework.</p>
<p>Question 2: Do you have any comments on our approach to dealing with the interference challenges raised by NGSO systems?</p>	<p>Confidential? – N</p> <p>While Eutelsat agrees encouraging cooperation is a key solution to mitigate risks to service quality, the basis of such cooperation should be the ITU coordination procedures.</p> <p>In fact, Ofcom’s approach to dealing with the interference challenges raised by NGSO systems must be done in accordance with ITU coordination principles, even if additional obligations can be deemed necessary.</p>
<p>Question 3: Do you have any comments on the proposed updates to our process for NGSO gateway and network licences?</p>	<p>Confidential? – N</p> <p>Ofcom states in several parts of the consultation document that it supports the coordination of satellite networks through the ITU procedures, and that the proposed approach to licensing does not change or replace these procedures.</p> <p>Eutelsat is however worried that the ITU framework is left aside, especially since there is no explicit mention of the need to complete ITU coordination obligations in the licence’s conditions. As said by Ofcom, the ITU coordination procedure can support the UK’s national licensing objectives. Eutelsat believes the ITU framework should be the basis of Ofcom’s approach to manage interferences between satellite systems.</p> <p>Moreover, Eutelsat is of the view licensees cannot be asked to be flexible to accommodate to future systems on which there is no information available.</p>
<p>Question 4: Do you have any comments on the proposed updates to existing and new NGSO network licences?</p>	<p>Confidential? – N</p> <p>Eutelsat welcomes the inclusion of a note in the licences to clarify that the conditions of the licence does not affect any obligations licensees may have under the ITU framework.</p> <p>Eutelsat nevertheless believes this is not sufficient and that a clear recognition of the ITU framework should be included in the licence</p>

	<p>conditions. In order to mitigate the risk of harmful interference between NGSO systems, Eutelsat recommends Ofcom require that licensees complete their coordination obligations at ITU level, or that significant coordination efforts have been undertaken and/or are underway with the applicant in accordance with any new milestones or timeframes that Ofcom enacts, and that it is accepted that in the event of interference, they will change the way they offer services to the public to mitigate it.</p>
<p>Question 5: Do you have any comments on the proposed updates to existing and new NGSO gateway licences?</p>	<p>Confidential? – N</p> <p>See response to question 4.</p>
<p>Question 6: Do you agree with our proposal regarding NGSO terminals operating in Ka band?</p>	<p>Confidential? – N</p> <p>Yes.</p>

Please complete this form in full and return to NGSO.Licensing.Consultation@ofcom.org.uk.