

## Your response

Question	Your response
<b>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?</b>	<p>Confidential? – N Hughes urges Ofcom to also consider the impact that non-geostationary orbit (“NGSO”) satellite systems can have on the operations of geostationary orbit satellite systems (“GSO”). It is critical that Ofcom adopt rules that ensure the operations of NGSO systems do not interfere with UK-authorized GSO networks. Failure to do so will likely result in interference into GSO networks operating in accordance with ITU rules, hence diminishing service quality and competition.</p> <p>In addition, Ofcom should impose these rules only on NGSO broadband systems (i.e., Ku/Ka band NGSO systems).</p>
<b>Question 2: Do you have any comments on our approach to dealing with the interference challenges raised by NGSO systems?</b>	<p>Confidential? – N</p> <p>As Ofcom as it has recognized cannot, “solely rely on the ITU framework to effectively deal with all concerns impacting NGSO services provided to the UK.” The ITU has long noted that NSGOs systems had the potential to interfere with GSO systems and developed a framework to ensure such protection by requiring coordination and actual compliance with EPFD limits. That framework was based on an assumption of 3.5 NGSO systems with around 288 satellites each.</p> <p>NGSO systems of tens of thousands are proposed and being launched into space. In addition, GSO technological developments that provide increased amounts of throughput to the end user have been deployed. Therefore, current ITU mechanisms are not sufficient to prevent harmful interference from large NGSO systems into GSO networks. Ofcom must adopt appropriate protections for GSO operators to be free from harmful interference caused by NGSO operators.</p>

<p><b>Question 3: Do you have any comments on the proposed updates to our process for NGSO gateway and network licences?</b></p>	<p>Confidential? – Y / N</p>
<p><b>Question 4: Do you have any comments on the proposed updates to existing and new NGSO network licences?</b></p>	<p>Confidential? – Y</p> <p>ITU has regulations for coordinating the shared use of the radio spectrum that require the <u>later-invented technology to bear the burden of avoiding interfering into the earlier-invented system</u>. The ITU Coordination Procedures have been developed precisely because wireless technologies must share spectrum resource, but – as there is no way to predict future systems – the burden to “mitigate the risk” of harmful interference can <u>only rest with the later-invented system</u>. Otherwise, systems filed later will gain an advantage, and so undermine fair competition (one of the main aims of Ofcom’s proposals set out in this consultation). Accordingly, Ofcom should impose a condition that UK satellite systems respect the ITU rights of other countries.</p>
<p><b>Question 5: Do you have any comments on the proposed updates to existing and new NGSO gateway licences?</b></p>	<p>Confidential? – Y / N</p>
<p><b>Question 6: Do you agree with our proposal regarding NGSO terminals operating in Ka band?</b></p>	<p>Confidential? – Y / N</p>

Please complete this form in full and return to [NGSO.Licensing.Consultation@ofcom.org.uk](mailto:NGSO.Licensing.Consultation@ofcom.org.uk).