

Your response

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<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>Lacuna Space welcomes the assessment of interference challenges and agrees with the conclusions made.</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>This is certainly a valid approach, perhaps it could benefit from more detail on how the co-operation of potential licensees is tracked, assessed and the lack of it potentially penalised.</p> <p>Lacuna Space agrees that efficient use of spectrum should be encouraged, however it is unclear how system flexibility and agility should be assessed and evaluated. For example, if somebody develops a very sensitive system in order to reduce emissions, why should this be penalised?</p> <p>Lacuna Space wonders if the process should include iterations/ follow-up discussions? If so, the response time for each iteration should be limited.</p> <p>Any licensing updates should ensure that the process cannot be misused in a way that large companies with a big legal team produce so much paperwork that it is not possible for smaller teams to process. Accordingly, there should be some measure to limit the required work on all sides.</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>We feel that the proposal can benefit from a bit more detail on the following aspects of the process:</p>

	<ul style="list-style-type: none"> • Will it be possible to react to competitors' comments before OFCOM draws a conclusion based on these comments? • What type of modifications will be done based on the comments? • What are Ofcom's assessment criteria for the ability to coexist? • Modification of licences: further detail on why adding more antennas would not change the interference environment. • It is not completely understood if the requirement to have control over the whole satellite network (including user terminals) is feasible for all types of NGSO systems, i.e. integrated applications where terminals are potentially deployed and licensed by network integrators, while satellite systems are deployed and licensed by the satellite service providers. Lacuna Space is of the view that (in this case) effective coordination can be reached even if ground terminal licences and satellite system licences are treated separately.
<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>It is admittedly difficult to assess "material and recurring degradation". As in the ITU RR, the definition of harmful interference is difficult to quantify, which can give interferers a lot of freedom to defend their (actually harmful) activity. Lacuna Space does not have a satisfying solution to this issue, but we would be pleased to be part of a process to define this further.</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 Question 4</p>

Question 6: Do you agree with our proposal regarding NGSO terminals operating in Ka band?

Confidential? – N

No view.

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