

Your response

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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>Confidential? – N</p> <p>Ofcom's role, as we see it, is to allow a competitive marketplace to ensue, providing subscriber choice and national resilience of operators. The perceived interference challenges have not yet become actual challenges. The role of Ofcom is to intervene when there is a material failure in self-regulation.</p> <p>At the moment, we do not see any such failure and are not aware of any incidences of the need to coordinate geographically in the UK and wider dependencies.</p> <p>We are keen that Ofcom does not “apply the brakes” to the deployment of a rapidly accelerating technology, however, in our opinion this consultation does just that.</p> <p>It’s clear that there is a dominant market leader in terms of their efficacy to deploy space asset and to reach market. It is a commercial challenge to other operators to compete and we are keen to see that competition - which could result in Ofcom intervention should those parties not be able to coordinate in relation to interference.</p>
Question 2: Do you have any comments on our approach to dealing with the interference challenges raised by NGSO systems?	<p>Confidential? – Y / N</p> <p>Yes, following recent verbal clarifications by Ofcom, we are highly supportive of Ofcom’s approach to ensure that all Operators are flexible in their approach to accommodating interference from other Operators. We are also keen to ensure that Ofcom doesn’t use it’s powers to prevent an inflexible operator creating geographic sterilisation for others and to prevent monopoly by operators without the technical resources to accommodate others.</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>Yes, such updates need to accommodate our comments to (1) and (2).</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>Yes, such updates need to accommodate our comments to (1) and (2).</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>Ref Para 4.2, 6.8, 6.9, we acknowledge the proposal to create a precondition of new licensing is to bring any existing licensing held by the applicant into line with the new licensing rules. We do not see any parallels that can be drawn herein with the approach in other regional spectral management. For example, but not limited to the Shared Spectrum programme, whereby new entrants encounter areas sterilised by legacy license holders. Does Ofcom intend to apply the same approach across all similar scenario? We welcome further information on how this approach could become universally adopted fairly. We believe that if it is to only apply in the domain of satellite technology, there is an uneven application of Regulatory method.</p>
<p>Question 6: Do you agree with our proposal regarding NGSO terminals operating in Ka band?</p>	<p>Confidential? – N</p> <p>No. We think this conflates issues with service delivery and service operation. Operators should develop the necessary technology to accommodate this mode of operation. Those who cannot, will need to pursue and invest in research and development to allow this model of operation.</p>

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