

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? – No</p> <p>MOD welcomes the introduction of this licence product to help manage the increasingly congested space environment including the ground infrastructure but, as you know, MOD is a Crown body and therefore does not need licences to operate. Although not explicit I have been assured by Ofcom that this consultation only covers the civil part of the Ka band (19.7 – 20.2 GHz and 29.1 – 30 GHz). MOD operate in the bands just above 20.2 – 21 GHz and 30 – 31 GHz so these proposed changes will impact MOD users at the band edges (+/- 50 MHz or so at 21 and 30 GHz).</p> <p>MOD is operating NGSO satellites already with plans to use additional sites as new satellite networks are developed. The MOD has not had significant interactions with commercial networks because it has not needed to but that may need to change as the UK becomes a bigger player in the space market attracting more and more companies to operate in the UK. Because of this MOD ground stations may need to be formally recognised with both Ofcom and the ITU. MOD ambitions in the NGSO orbit continue to develop so new ground stations are likely to be needed to meet mission needs which may need to be registered.</p> <p>The consultation also outlines the ITU process for satellite filings and ground station notification which affords a level of international protection from interference. The only site that has followed the ITU registration process is Menwith Hill, the two remaining sites have not (Oakhanger and Colerne). Ofcom recognise their existence and provide them with adequate protection however this consultation suggests a first come first served approach with both parties having to come to some agreement firstly on the deployment to start with and then if there are any interference issues. The danger is the MOD may have to</p>

	<p>trade capability/bandwidth for an agreement to operate especially as more ground stations are needed to meet the MOD space demand.</p> <p>This consultation focuses on managing interference, supporting competition and transparency, there is likely to be a well-developed Ka ecosystem before the MOD develops its own Mil Ka capabilities so there needs to be recognition of current and future ground stations so that MOD interests are considered. MOD also has a number of transportable ground stations used for training on the land and at sea which currently do not use Ka but may do in the future.</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? – Yes</p> <p>[REDACTED]</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? – Yes</p> <p>[REDACTED]</p>
<p>Question 4: Do you have any comments on the proposed updates to existing and new NGSO network licences?</p>	<p>Confidential? – No</p> <p>MOD does not have any comments to make about the proposals because as Crown users we are exempt from these licences.</p>
<p>Question 5: Do you have any comments on the proposed updates to existing and new NGSO gateway licences?</p>	<p>Confidential? – No</p> <p>MOD does not have any comments to make about the proposals because as Crown users we are exempt from these licences.</p>
<p>Question 6: Do you agree with our proposal regarding NGSO terminals operating in Ka band?</p>	<p>Confidential? – No</p> <p>MOD has several transportable ground stations that will need to be considered as part of this consultation. Although current capabilities do not use Ka, that could change in the future. Therefore, a process to support future MOD</p>

	capability requirements may need to be created, but that will be done in direct discussions not through this consultation.
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