



Arqiva Response to Ofcom Consultation on Space Spectrum Strategy

24th May 2022

Overview

Arqiva welcomes the opportunity to respond to Ofcom's consultation on space spectrum strategy, setting out our views on how the development of spectrum will assist with the implementation of new systems and with the need for protection of existing consumer and business services.

Arqiva is keen to support the development of this sector and the innovation and opportunities that new services and operators will create. As an established earth station uplink provider with ambitions to expand its business in this area, Arqiva wants the sector to develop fully and operate efficiently. Arqiva wants the satellite community and operators of all systems to see the UK as an attractive place to invest and base services. We encourage Ofcom to adopt the development of the spectrum in ways that support the development of the sector, attract investment into the UK and enable consumers to benefit fully from services.

In general, Arqiva recognises the challenges Ofcom has identified in its consultation and the interest that it has in the broad areas identified.

Arqiva also supports the objective of ensuring that systems can co-exist and interference can be managed. We do not want to see the development of any one NGSO system unnecessarily preventing the operation of other systems and we also do not want to see the development of the NGSO sector overall either impact or harm the ongoing operation of fixed Geostationary Orbit, (GSO), satellite operator systems.

Whilst supportive of Ofcom's objectives and the high-level approach, Arqiva has some concerns that it would like Ofcom to consider and take into account as it develops its new spectrum strategy. These issues are highlighted below.

Protection of Existing Services for Consumers and Business

Arqiva recognises the areas that have been identified as a priority for Ofcom's work in the next few years. We notice in particular that supporting and developing UK media by enabling the use of spectrum for satellite broadcasting to provide a wide range of TV content has been acknowledged, but not prioritised.

Arqiva would be concerned if current support for this area diminished in the future. As Ofcom states, satellite broadcasting is relatively stable. For both satellite TV and TV production, we would expect this to continue to need to be well supported and protected by Ofcom. We acknowledge the significant number of consumers stated by Ofcom that have either satellite pay TV or a free to view satellite service. We agree with Ofcom's view that satellite broadcasting services deliver valuable TV content to consumers.

The risk of delays to the development of the sector

Arqiva has previously stated in the response to the NGSO licence updates consultation in 2021 that Arqiva is concerned that Ofcom's approach and new proposals will have a chilling effect on the development of the sector. With the introduction of the new licence conditions, we have not seen any significant improvement in the responsiveness to allow developments in this sector.

Arqiva has an over-arching concern that there is a risk that Ofcom has implemented a licensing system which might make the UK a less attractive base for NGSO services than other European locations. If Ofcom adopts an approach which places greater obligations than other markets, or is too cautious in how it assesses the potential impact of some level of future and unspecified competition, then there is a risk that operators will just base themselves elsewhere and service UK consumers from overseas.

Consultation Questions

The context for a strategic refresh

Question 1: Are there other trends in the space sector (or the broader spectrum environment) that we should monitor and/or take account of in our strategy?

In general, Arqiva recognises the challenges that Ofcom has identified in its consultation and the interest that it has in the broad areas identified.

Arqiva also supports the objective of ensuring that systems can co-exist and interference can be managed with the increase in the scale and number of parties involved in space spectrum use. We do not want to see the development of any one NGSO system unnecessarily preventing the operation of other systems and while being supportive of the benefits that the NGSO sector can provide and being keen to work with operators in this area, we also do not want to see the development of the NGSO sector overall either impact or harm the ongoing operation of fixed Geostationary Orbit, (GSO), satellite operator systems.

Arqiva continues to look to provide services to operators looking to use earth stations in the UK and able to support long-term investment in such facilities. We would ask for consideration by Ofcom of their use of regulation to ensure that this does not introduce regular and significant changes of regulation that discourage investment in the UK. In the context of the space spectrum strategy, it would appear right for Ofcom to ensure that it does not introduce regulatory changes that additionally confuse or limit the market.

Ofcom's strategic objectives and priorities

Question 2: Do you agree with the broad areas we have prioritised for our work?

Arqiva recognises the areas that have been identified as priorities for Ofcom's work in the next few years. We notice in particular that supporting and developing UK media by enabling the use of spectrum for satellite broadcasting to provide a wide range of TV content has been acknowledged, but not prioritised.

Arqiva would be concerned if any lessening of the current support for this area were to be a consequence of the lack of a priority for this area, both in the current period of interest or in the future. As Ofcom states, satellite broadcasting is relatively stable and for both satellite TV and TV production we would expect this to continue to need to be well supported and protected by Ofcom. We acknowledge the significant number of consumers stated by Ofcom that have either satellite pay TV or a free to view satellite service.

We agree with Ofcom's view that satellite broadcasting services deliver valuable TV content to consumers. We do not for now see a requirement for expansion of the spectrum available for satellite broadcasting or to change the use of this satellite broadcasting spectrum.

We do want Ofcom to be clear in the developments of further use of spectrum for satellite use that are raised elsewhere in the consultation that the existing services provided to consumers and other businesses are not degraded by these developments. We would seek explicit protection of existing GSO services, such as those for satellite broadcasting earth station uplinks and broadcast signals, to be addressed in the regulation and licensing of such new developments.

Ofcom work areas and actions

Question 3: Are there other issues and actions that are likely to be important over the next 2 – 4 years?

Arqiva believes that the changes in the NGSO market are likely to be most significant in the actions being considered by Ofcom. As we have said in our response to Question 1, we would see the increase in scale and number of parties involved in space spectrum use as key to the focus required in the next 2-4 years.

Question 4: Do you have any evidence on whether specific actions should be a high priority?

Arqiva has no further response here.

Question 5: Do you have any other issues you wish to comment on?

Arqiva has no further response here.

NGSO satellite communications

Question 6: Are there other issues and actions specifically relating to NGSO communication systems that are likely to be important over the next 2 – 4 years?

Arqiva has been an active part of the new developments for NGSO system operators and the provision of earth station services as part of this. We acknowledge that Ofcom sees this as an area for innovation and developments in the next 2-4 years.

We agree with this and look for clarity and appropriate, effective and timely regulation and licensing in this area.

As we have stated in our response to Question 2, we are keen that the focus on developments in NGSO systems does not degrade the existing operation of satellite broadcasting and other GSO services in the near future and beyond. We see these as valuable to the consumer and to other businesses operating in the UK.

We see that Ofcom is proposing to consider introducing a new licence condition to deal with NGSO downlinks causing harmful interference to GSO receivers in the UK; to develop Ofcom's ability to verify and investigate cases of suspected harmful interference to GSO satellites, as well as contributing to the development of a recognised international approach to investigating NGSO to GSO interference; and to engage with international discussions on the evolution of regulations on NGSO-GSO sharing, to promote an appropriate balance between assurance of GSO benefits and efficient sharing with NGSO systems. We support these actions.



Question 7: Do you have any evidence on whether specific actions relating to NGSO communication systems should be a high priority?

Arqiva has no further response here.

Question 8: Do you have any other comments relating to NGSO systems?

Arqiva has no further response here.

About Arqiva

Arqiva is at the heart of the broadcast and utilities sectors in the UK and beyond, providing critical communications infrastructure and media services. Arqiva provides much of the infrastructure behind television, radio, mobile and other wireless communications in the UK and we are at the forefront of network solutions and services in an increasingly digital world. Arqiva is the only national provider of terrestrial television and radio broadcasting and provides a machine-to-machine connectivity network for smart metering within the utilities sector.

Arqiva has a long heritage of satellite services in broadcast and data. We operate at scale within the UK across a number of secure, best-in-class teleports and sites, which provide services to both geostationary orbit and non-geostationary orbit, (NGSO), satellite operator customers. We are trusted by global operators and service providers to deliver their end-to-end services and we work closely with our customers to overcome complexity, ensuring they have the level of support they need to service their end-users.

Arqiva operates four world class teleports (Tier 4 WTA accreditation at Chalfont Grove) accessing C, Ku, Ka and X bands alongside a growing number of LEO gateway sites in the UK, with best-in-class levels of operational resilience. We also have access to a wide range of secure sites across the UK with connectivity and power, supported by a nation-wide field service team and accompanied by site acquisition and management expertise.

Arqiva's history can be traced back to 1922 when it broadcast the world's first national radio service. In 1936 it carried the BBC's first television broadcast. In 1978 it enabled Europe's first satellite TV test. By the 1990s Arqiva was working with the UK's mobile operators to bring mobile telecommunications to UK businesses and consumers. In the 2000s, it launched the UK's national DAB radio and Digital Terrestrial Television networks. Most recently, Arqiva has played a pioneering role in the roll-out of the national smart energy and water metering networks.

Arqiva's teams are, behind the scenes, delivering millions of vital connections every day for our customers, the major UK and international broadcasters, independent radio groups as well as major utility companies and networks.

Arqiva is owned by a consortium of infrastructure investors and has its headquarters in Hampshire, with major UK offices in London, Buckinghamshire and Yorkshire and operational centres in the West Midlands and Scotland.