

## Your response

Question	Your response
<p><b>Question 1:</b> Do you agree with our proposal to update the Earth Station Network Licence to include a new provision authorising NGSO maritime services in the territorial seas of the UK and the Crown Dependencies? If you do not agree, please explain your reasons.</p>	<p>Telesat applauds Ofcom for acknowledging the importance of NGSO services for UK consumers and business and for taking the necessary regulatory steps to encourage the use of some of these NGSO services in the UK. Ofcom correctly identifies that NGSO satellites are increasingly used to provide connectivity for maritime passengers. Indeed, there is an increasing demand of people to stay connected regardless of their location, and in places that are unreachable through terrestrial networks including vessels, but also airplanes.</p> <p>In this respect, Telesat most welcomes Ofcom's proposal to update the Earth Station Network License in order to include the authorisation of NGSO maritime services in the Ka band in the territorial seas of the UK, the Channel Islands and the Isle of Man. Telesat also anticipates that the authorization would extend to include NGSO aeronautical terminals pending the outcome of WRC-23 AI 1.16.</p>
<p><b>Question 2:</b> Do you agree with our proposal to introduce a licence condition in relation to NGSO downlinks to protect GSO satellites, and earth stations communicating with GSO satellites? If you do not agree, please explain your reasons.</p>	<p>Telesat agrees with Ofcom on a licence condition according to which the satellite system within which the earth stations operate should comply with the relevant limits in Article 22 of the Radio Regulations.</p>
<p><b>Question 3:</b> Do you agree with our proposal to introduce a licence condition setting out requirements for the protection of radio astronomy from harmful interference in relation to NGSO downlinks? If you do not agree, please explain your reasons.</p>	<p>Telesat has no additional comment</p>
<p><b>Question 4:</b> Do you agree with our proposal to introduce licence conditions setting out requirements for the protection of fixed links from harmful interference in relation to NGSO downlinks? If</p>	<p>Telesat agrees with Ofcom on a licence condition according to which the satellite system within which the earth stations operate should comply with the limits in Article 21 of the Radio Regulations. In any case, Telesat agrees with Ofcom that NGSO satellites shall not cause harmful interference to fixed links and</p>

you do not agree, please explain your reasons.

compliance with article 21 does not release licensees from this obligation.

**Question 5:** Do you have any additional comments regarding any of our proposals?

***Spectrum access and national authorization for NGSO maritime and aeronautical ESIMs***

Telesat notes Ofcom statement in point 2.14 of the Consultation document.

Telesat understands that, pending the outcome of WRC-23, Ofcom will consider a) to update the Earth Station Network License in order to include NGSO aeronautical terminals b) to grant access for aeronautical and maritime ESIM transmitting in the full 27.5-30 GHz band. Telesat is very supportive of the Ofcom plan.

The next World Radiocommunication Conference (WRC-23) will consider establishing a globally harmonised framework in the Kaband for aeronautical and maritime ESIM communicating with non-geostationary orbit (NGSO) satellites under agenda item 1.16. This will encourage more competition and lower latency for broadband services enabled by NGSO ESIM.

Therefore, Ofcom is encouraged to continue supporting the development of a regulatory framework for the operations of NGSO ESIM in the Ka-band.

Finally, Telesat appreciates this opportunity to provide comments on the important matters raised in this Consultation, remains available for possible additional clarifications and looks forward to continuing the discussion and collaboration with Ofcom.