

Your response

Q1: Do you agree with our proposal to open access to the bands shown in Table 1 for satellite gateway use under the existing NGSO gateway and PES licences with the associated licensing process and fees? Are there other uses of these frequencies which you would prefer to be authorised in these bands?

Confidential? – N

Amazon welcomes Ofcom's proposal to make the frequency ranges set out in Table 11 of the Consultation ("**Additional 28 GHz Frequencies**") available to satellite gateway use; specifically, a total of 560 MHz at 27.8285-28.0525 GHz (224 MHz), 28.8365-29.0605 MHz (224 MHz), 28.1645-28.1925 MHz (28 MHz), 28.3045-28.3325 MHz (28 MHz), 29.1725-29.2005 MHz (28 MHz), and 29.3125-29.3405 MHz (28 MHz).

Amazon supports Ofcom's proposal for such use to be under the existing licences (NGSO Earth Station (Gateway) and Permanent Earth Station (PES)), and for the associated licensing process and fees for such licences to apply.

In addition to making the Additional 28 GHz Frequencies available for satellite gateway use, Amazon supports Ofcom making these frequencies available for use by uncoordinated satellite terminals under the Earth Station Network Licence, and for the associated licensing process and fees for such licence to apply.

Question	Your response
<p>Q2: Do you agree with our initial assessment that our proposals would benefit citizens and consumers and would not materially affect existing users of the 28 GHz band as well as future users of the unassigned spectrum?</p>	<p>Amazon agrees with Ofcom’s initial assessment that making the Additional 28 GHz Frequencies available for use by satellite gateways would be beneficial to citizens and customers in the UK. Amazon also agrees that extending access for satellite gateway use in the Additional 28 GHz Frequencies will not materially affect existing users of the 28 GHz band.</p> <p>Making the Additional 28 GHz Frequencies available for use under the existing NGSO Earth Station (Gateway) and PES licences would increase available capacity for satellite systems, including NGSO FSS systems operating or planning to operate in the 28 GHz band. Further, access to these additional frequencies will help operators meet the growing demand for satellite services in the UK and benefit citizens and customers throughout the country, particularly in hard to reach areas.</p> <p>As recognized by Ofcom in the consultation, space-based connectivity is increasingly important for UK consumers and businesses, and frequencies in the 28 GHz band are a core element to enable satellite operators to deliver</p>

connectivity services. Because satellite systems are operated under international procedures to coordinate and share spectrum, and are in fact required to do so pursuant to licence conditions for satellite operators in the UK, making the Additional 28 GHz Frequencies available for satellite gateway use will permit more intensive use of this finite spectrum resource by supporting multiple services and operators.

While frequencies in the 28 GHz band are also accessed by fixed wireless service operators in the UK, their use is adjacent to the Additional 28 GHz Frequencies. Therefore, the operations of these fixed wireless service systems will not be impacted by satellite use of the Additional 28 GHz Frequencies. In fact, NGSO FSS earth stations can limit their off-axis adjacent-band power in the direction of fixed wireless receivers, limiting potential interference issues.

Amazon further agrees with Ofcom that future users of the Additional 28 GHz Frequencies will not be significantly constrained due to satellite systems being deployed in the UK. Potential future terrestrial licensees in the 28 GHz band are likely to operate highly localized systems and not be impacted by NGSO FSS systems.

Question	Your response
<p>Q3: Do you have further views / comments that you wish to make in respect of this consultation?</p>	<p>Confidential? – N</p> <p>Administrative incentive pricing licence fees</p> <p>At paragraph 3.17 of the Consultation, Ofcom stated that it will consider administrative incentive pricing (AIP) licence fees for NGSO earth stations when next reviewing the pricing of satellite earth station licences. Amazon does not support the application of AIP licence fees for spectrum access for NGSO earth stations, and encourages Ofcom to adopt a predictable fee structure for use of the 28 GHz band based on the recovery of administrative costs. Administrative cost-based fees are appropriate for spectrum access for satellite systems, as this spectrum is shared between different GSO and NGSO stations.</p> <p>Opening Spectrum for Uncoordinated Earth Stations</p> <p>Ofcom noted at paragraphs 3.29 and 3.30 of the Consultation its plans to consult on making further spectrum available to uncoordinated earth stations, including:</p> <ul style="list-style-type: none"> a) the Additional 28 GHz Frequencies; b) parts of the 28 GHz band currently held by spectrum access licensees; and c) the Q/V band. <p>Amazon welcomes Ofcom’s work on such future consultations, and provides its support in principle for such frequencies to be made available to uncoordinated NGSO earth stations. Amazon further supports Ofcom’s proposal to bring forward its consultation on item (b) above.</p>