

Your response

Question	Your response
<p>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?</p>	<p>Confidential? – N</p> <p>Rivada Space Networks agrees to the proposal to make the now unassigned spectrum including the four 28 MHz guard bands available for the Earth-to-space communication of satellite gateways. Doing so by extending the available bands in the established NGSO gateway and PES licensing processes is a pragmatic solution. It is very timely in view of the recent tremendous growth in satellites services, driven by NGSO systems such as Rivada. Therefore, we urge Ofcom to see this as a first step towards opening the very same spectrum in the near future for user communications with satellite systems, i.e. include the frequencies for uncoordinated and licence exempt usage in combination with an NGSO network licence. Rivada Space Networks shares Ofcom’s assessment/anticipation of “a limited number of satellite gateways, [...] in rural locations” and that they can therefore share the spectrum with uncoordinated satellite terminals (paragraphs 3.5 and 3.25 a) of the consultation document) and encourages Ofcom to take this logical second step in the shortest delays. Access for service use will have a far more beneficial use for UK businesses and citizens than gateway use alone.</p>

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>Confidential? – N</p> <p>When implemented as planned, the proposal will surely benefit citizens, consumers, businesses and satellite operators as it will allow an increased usage as compared to the previously exclusive, national assignment to a single user. As already stated in our answer to question 1, Rivada Space Networks sees an even more beneficial and efficient scenario for the future: opening up the now available spectrum also for the communication of user terminals with satellite systems. Not all satellite systems require the use of gateways. But all systems relay on the availability of spectrum for user terminals.</p> <p>Rivada Space Networks shares Ofcom’s overall impact assessment that making more spectrum available for satellite gateways “would not significantly constrain deployment of future users in the unassigned spectrum nor adversely affect existing users” (as stated in paragraph 3.20 of the consultation document). We also expect that assessment to remain valid in the scenario where the communication of uncoordinated user terminals is authorized in the same bands.</p>

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>Rivada Space Networks welcomes Ofcom’s “plan to consult on authorisation options for the wider use of the unassigned spectrum by other users later this year” (paragraph 3.6 of the consultation document).</p> <p>We respectfully request that usage by uncoordinated user terminals will be proposed in that consultation along with the proposal to authorize this additional usage in combination with the established process to obtain a NGSO network licence in the UK.</p> <p>This is a great opportunity to make more contiguous spectrum available for satellite services as the current fragmentation of the band in exclusively assigned spectrum for terrestrial users and shared spectrum for nonterrestrial uses is not the most efficient allocation. To that end, Rivada Space Networks encourages Ofcom to seize every opportunity to reduce the existing exclusive usage rights in the band and keep working towards allowing as many parallel users and uses as interferencefree coexistence technically allows.</p>