

Arqiva Submission: Ofcom Consultation 'Increasing Use of the 27.5 – 30 GHz Band'

Arqiva welcomes the opportunity to respond to the Ofcom consultation on its proposal for improving spectrum access for satellite gateways and enabling other uses and the particular focus on increasing use of the 27.5 - 30 GHz band.

Arqiva is a communications, infrastructure and media services company at the heart of the broadcast and utilities sectors in the UK. We deliver broadcast television and radio services nationally and provide satellite data and gateway services. We also provide machine-to-machine connectivity for smart metering within the energy and water sectors.

Set out below is our response to the consultation questions.

Response to consultation questions

Question 1

Do you agree with our analysis of the case for regulatory intervention and our proposal to license satellite gateways to access 28 GHz spectrum in portions of the band not currently available for satellite gateways? If not, please provide reasons/evidence for your response.

Arqiva is supportive of the proposal to license satellite gateways in portions of the band not currently available for satellite gateways. We see that this will potentially simplify the processes around access to the spectrum needed to operate the satellite gateways for which Arqiva currently provides services.

Question 2

If we decide to proceed with this proposal to license satellite gateways to access 28 GHz spectrum in portions of the band not currently available for satellite gateways, do you agree with our proposal not to adjust Spectrum Access licence fees to reflect locations where we authorise future satellite gateways? If not, please provide reasons/evidence for your response.

We note that in paragraph 3.16 of this consultation Ofcom states that "As noted in our Space Spectrum Strategy statement (paragraph 4.29), we will consider the introduction of AIP licence fees for NGSO satellite Earth stations, to reflect the opportunity cost of spectrum denied to other uses and users (rather than just the costs of managing the radio spectrum) when we next review the pricing of our satellite Earth station licences." This is also referred to in paragraphs 4.36 and 6.37.

Arqiva will be interested to understand the timetable for this and the comparisons and approach that are used in determining the introduction of the AIP licence fees, given the previous approach for the annual licence fee for the national spectrum access licence that caused Arqiva to return nearly all of the national spectrum access band.



Question 3

Do you have any further views / comments on our proposal to license satellite gateways to access 28 GHz spectrum in portions of the band not currently available for satellite gateways?

Argiva has no further comments for this proposal at this time.

Question 4

Have we correctly identified the possible uses of the returned spectrum? If not, what other potential uses should we consider?

Arqiva supports the ongoing use of the spectrum for NGSO gateways and will work with existing and potential future customers in providing gateway services.

Question 5

As a satellite operator, are you currently constrained by the amount of spectrum available in the 28 GHz uplink and 18 GHz downlink to provide your planned and or existing satellite services to UK consumers and citizens? If so, please explain what constraints exist in each band.

As Arqiva is not a satellite operator, Arqiva has not provided a response to this question.

Question 6

Do you agree with our initial view that alternative use of the returned spectrum would be an allocation decision for either point-to-point fixed links or land-based satellite terminal use because it is unlikely both services can share and auctioning the spectrum is unlikely to secure optimal use? If not, please provide evidence to support your response.

Arqiva has no comment on the alternative uses proposed. Arqiva is keen to ensure that any alternative use will allow the existing and potential future NGSO gateway use to continue without interference.

Question 7

Do you agree with our initial view to make 112 MHz at 28.8365 - 28.9485 GHz available for land-based satellite terminal use, $2 \times 112 \text{ MHz}$ for point-to-point fixed links at 27.9405 - 28.0525 GHz and 28.9485 - 29.0605 GHz and defer allocating the remaining 112 MHz of spectrum? If not, what alternative suggestions do you have?

Arqiva has no comments for this approach at this time.



Question 8

Do you agree with our assessment of how the returned spectrum may be authorised for fixed links and GSO and NGSO land-based satellite terminals? If not, please provide evidence to support your response.

Arqiva has no comments for this assessment at this time.

Question 9

Do you have a view on demand for point-to-point fixed links in Northern Ireland and London in the frequency range 28.1925 – 28.3045 GHz paired with 29.2005 – 29.3125 GHz and our proposed approach that, if we were to decide to make this spectrum available for fixed links, would be to authorise this as Ofcom managed spectrum licensed on a first come first served basis?

Arqiva has no further comments for this demand at this time.

Question 10

Do you have further views / comments that you wish to make in respect of this consultation?

Arqiva has no further comments at this time.



About Arqiva

Arqiva is a leading UK communications service and infrastructure provider serving multiple industries.

We operate at the forefront of the UK broadcast industry, enabling our customers to reach and engage audiences across technologies and platforms for watching TV and other content. We deliver a range of products and services for the management and distribution of content at-scale, both in the UK and internationally. We are also a UK critical national infrastructure operator, managing the digital terrestrial television (DTT) network and broadcast radio network that ensures the universal availability of a wide range of free-to-air TV and radio services. Our customers include UK public service broadcasters, as well as a wide range of commercial TV and radio providers, which deliver news, information, education, and entertainment across the entire UK.

We are dedicated to supporting and advancing the UK's broadcast and streaming industries, ensuring that our customers can deliver their content to audiences wherever they are and however they choose to watch – with services meeting the highest standards for user experience, reliability, and security.

We provide satellite Direct to Home, (DTH) broadcast services as well as data and gateway services. We also provide machine-to-machine connectivity for smart metering within the energy and water sectors.