

Your response

Background

1. Eutelsat Group (hereinafter “EG”) was formed in September 2023 through the combination of Eutelsat, a global GEO satellite operator, and LEO constellation operator OneWeb – creating one of the world’s most innovative and experienced commercial satellite operators. The company is headquartered in Paris, with the centre of its Low Earth Orbit (LEO) operations based in London.
2. With a fleet of 35 geostationary satellites and a LEO constellation of more than 600 satellites providing capacity for broadcasters, media service providers, telecom operators, ISPs and governmental agencies, Eutelsat Group is the world’s first satellite operator with an integrated GEO-LEO infrastructure. Our satellites are used for video broadcasting, satellite newsgathering, broadband services, data connectivity, connecting aviation and maritime, and enabling mission-critical government and NGO communications.

Question	Your response
<p>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.</p>	<p>The 27.5-30GHz (“28GHz”) band is one of the core bands for satellite uplink, and EG has invested heavily in the development of GSO and NGSO satellites operating in the said band to provide, <i>inter alia</i>, broadband connectivity services around the globe. Therefore, we salute Ofcom’s proposal to allow direct access for satellite Gateways (“GWs”) to the portions of the 28GHz band which are currently unavailable, as typically, satellite GWs are designed to use wideband channels that span the whole 28GHz band. Under the current framework, satellite operators are unnecessarily being constrained in accessing the entire band as they must enter into complex, time consuming and costly commercial negotiations in order to lease those portions of the band that are currently assigned to point-to-point fixed links under Spectrum Access Licensees (i.e. currently 672MHz of spectrum).</p> <p>Allowing direct access for satellite use through Ofcom’s normal NGSO Gateway and/or PES license application procedures will provide additional capacity, ultimately benefiting UK consumers and businesses.</p>
<p>Question 2: If we decide to proceed with this proposal to license satellite</p>	<p>N/A</p>

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<p>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.</p>	
<p>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?</p>	<p>EG underlines the need for any applicable framework to ensure successful coexistence between terrestrial services and satellite GWs deployments and other alternative uses.</p> <p>We believe that Ofcom’s proposal to authorise satellite services through the existing NGSO and PES licenses will ensure adequate protection. The implementation of Ofcom’s current licensing procedures, as well as of the well-established international satellite coordination processes, means that existing or future users of the 28GHz band will not be materially affected.</p> <p>Also, following a direct authorisation approach for satellite GWs in the entire 28GHz band, subject to consultation with concerned operators will allow satellite operators to respond to any objections raised by terrestrial operators and to demonstrate how any potential constraints could be avoided. Under this approach, satellite operators will not have to rely on the successful outcome of commercial negotiations with current licensees, avoiding additional costs and time-consuming processes.</p> <p>We further note that, currently, Shared Access License holders are not obliged to notify Ofcom of their existing and/or short-term planned deployments. To ensure coexistence, we welcome Ofcom’s proposal in par. 4.33 to require such information to be made publicly available so that satellite operators could carefully plan their future GWs deployment.</p>

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<p>Question 4: Have we correctly identified the possible uses of the returned spectrum? If not, what other potential uses should we consider?</p>	<p>Regarding the making available of returned spectrum to alternative uses, on top of gateways, EG believes that Ofcom should prioritise allocating spectrum to land-based satellite terminals.</p> <p>Under the existing satellite ITU regulations, coexistence between satellite GWs and satellite terminals is already being considered and thus, effective use of the spectrum would be ensured. Such an approach would also ensure availability of contiguous spectrum for satellite services.</p> <p>We also welcome a future consultation on authorising aeronautical and maritime mobile ESIM usage of the full 28GHz band, as proposed by Ofcom.</p>
<p>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.</p>	<p>The 28GHz band is a crucial band for satellite use. Current situation in the UK, being different to the one applicable in other neighboring countries in Europe and with some limitations on the volume of spectrum accessible to satellite applications in the 28GHz band, impacts the business-case and efficiency of services delivered or expected to be delivered.</p> <p>Therefore, we support Ofcom’s proposal to align its spectrum allocation with neighbours, and in coherence with ECC Decision (05)01, and allocate the entire frequency band to FSS gateway stations, as well as at least the 28.8365-28.9485GHz bands to land-based satellite terminals on a primary basis, noting that continuity of spectrum is key to meet evolving consumer demands.</p>
<p>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.</p>	<p>EG endorses Ofcom’s approach to allocate the returned spectrum to either of the two applications and to not auctioning the spectrum. As stated, satellite demand for the use of the 28GHz band is only expected to continue growing in the future; thus, we would encourage Ofcom to allocate the entire returned spectrum to satellite terminals (see Q.7) in addition to satellite GWs.</p> <p>Moreover, satellite operators can in principle share the frequency band through well-established coordination rules, thus ensuring optimal and effective use of the spectrum. Therefore, an auction procedure would unnecessarily restrict competition by limiting the number of potential players to enter the market.</p>

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<p>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 x 112 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?</p>	<p>EG supports Ofcom’s initial assessment to make at least 112MHz at 28.8365-28.9485GHz available for land-based satellite terminal use, as per Option 1.</p> <p>This would allow for a concrete implementation of the CEPT Decision (05)01 and would bring the UK frequency plan in line with it.</p>
<p>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.</p>	<p>N/A</p>
<p>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?</p>	<p>As repeatedly noted throughout the consultation, enabling access to more spectrum for satellite operators will support investment in the satellite sector in the UK, ultimately benefiting consumers and citizens.</p> <p>In this light, we respectfully ask Ofcom to open these frequencies for satellite GWs and uncoordinated satellite terminals only and to restrict access for fixed links in the regions of Northern Ireland and London, too.</p>
<p>Question 10: Do you have further views / comments that you wish to make in respect of this consultation?</p>	<p>EG would like to raise a final comment with regards to the applicable spectrum fees. As noted in par. 6.37 of the consultation, Ofcom is considering introducing an Administered Incentive Pricing (AIP) license fee for NGSO satellite Earth Stations (currently charged cost-based fees), similarly to PES licenses, to reflect the opportunity cost of spectrum denied to other users.</p> <p>EG commends the idea of following a consistent approach for both types of gateway licenses, as they refer</p>

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	<p>to the provision of similar type of services. However, we support Ofcom's decision to maintain the existing pricing policy for the new GWs to be licensed in the currently unavailable spectrum, to ensure a clear and transparent approach for the time-being.</p> <p>EG will respond separately to any future consultation regarding changes to the applicable spectrum pricing policy but is generally of the view that a common, simple and straightforward approach should apply for both NGSO and PES licenses.</p>

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