



Fountain Court, 2 Victoria Square,  
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Hertfordshire, AL1 3TF  
UNITED KINGDOM

**11 April 2017**

**Ofcom  
2a Southwark Bridge Road  
London  
SE1 9HA**

**RE:** Ofcom’s consultation on “Statement on improving spectrum access for consumers in the 5 GHz band” and “Notice of proposal to make Wireless Telegraphic Exemption Regulations 2017, Consultation on Regulations and technical parameters”, published on 9 March 2017

The Global VSAT Forum (“GVF”) is pleased to express our views on the above-noted Ofcom consultation.

GVF is U.K. based and serves as the leading voice of the international VSAT and satellite community. It is composed of members from every major region of the world and from every sector of the satellite industry, including satellite operators, manufacturers, system integrators and satellite service providers. GVF works with regulators around the world to design and promote regulatory structures that permit effective satellite services. A complete list of GVF members is available at:

<http://www.gvf.org/about-gvf/membersdirectory.html>

GVF membership includes all global satellite companies delivering essential communications services to modern societies using frequencies in the concerned bands. These companies regularly attend the annual VSAT Global event held in London in September (<https://tmt.knect365.com/vsat-global/>) and will again meet at the GVF HTS London Roundtable 2017 in December to discuss the continued role and development of the sector in Europe and other regions of the world.

In all spectrum matters, GVF coordinates closely with its partner association, the EMEA Satellite Operators Association (“ESOA”), whose views – conveyed separately by ESOA in this proceeding – the GVF fully endorses. Most notably, these views include the following:



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- This consultation brings the opportunity to give assurances to the space industry that spectrum required by the industry will be accessible for the continuation and growth of services that are essential to the UK economy and citizens
- The band 5725-5850 MHz is under discussion under WRC-19 Agenda Item 1.16 and that studies are on-going, including on the appropriate value for the limit on the maximum eirp of RLAN APs to protect FSS satellite receivers
- It is preferable to wait for the completion of the technical studies under WRC-19 Agenda Item 1.16 to determine the appropriate set of technical conditions to ensure protection of the FSS in the band 5725-5850 MHz (Region 1)

Otherwise, GVF welcomes the decision to prohibit WAS outdoor use, and can support the proposed center frequency and channeling arrangements for the 20 MHz channels (i.e. upper channel in 5815-5835 MHz), which we understand would ensure a 15 MHz guardband with respect to the band 5850-5925 MHz

Finally, GVF would like to express again the view that the bands 5850-5925 MHz (FSS) and 5350-5470 MHz (EESS) are of extreme importance to the global satellite industry and that GVF is opposed to the other options for the bands 5850-5925 MHz and 5350-5470 MHz mentioned in the 2016 OFCOM consultation document on WAS (aimed to ensure the protection of the FSS)

GVF remains at Ofcom's disposal for any further consultation or discussion related to these proceedings. The GVF agrees to its comments being available for public viewing on Ofcom's website.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Hartshorn', with a long horizontal flourish extending to the right.

**David Hartshorn**  
Secretary General  
Global VSAT Forum  
[David.Hartshorn@gvf.org](mailto:David.Hartshorn@gvf.org)