BASIC DETAILS

Consultation title: **Recognised Spectrum Access ("RSA") for Receive Only Earth Stations in the Bands 1690-1710 MHz, 3600-4200 MHz and 7750-7850 MHz**

To (Ofcom contact): **SPG Space Services**

Name of respondent: **David Bryant**

Representing (self or organisation/s): **British Telecommunications plc**

Address (if not received by email):

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Nothing	X	Name/contact details/ job title	
Whole response		Organisation	
Part of the response		If there is no separate annex, which part	

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Yes		No	

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Name David Bryant Signed (if hard copy)

BT Response to the Ofcom Consultation on

Recognised Spectrum Access for Satellite Receive-Only Earth Stations

Submission date:
7th September 2010

1. Introduction

BT welcomes this opportunity to contribute to the proposals from Ofcom on the introduction of Recognised Spectrum Access (RSA) for satellite receive-only Earth stations in three frequency bands, 1690 - 1710 MHz, 3600 - 4200 MHz and 7750 - 7850 MHz.

We have provided a summary of our views on Ofcom's proposals in section 2 and have addressed the specific consultation questions in Section 3.

2. Summary of BT views

Whilst BT understands the reasoning to introduce RSA in the bands proposed, we do not feel that the principles can necessarily be applied in the same manner in other frequency bands which are shared between terrestrial and satellite services. BT understands that Ofcom would separately consult on extending RSA to other satellite space-to-Earth bands and strongly supports this approach as each frequency band is different in terms of usage by terrestrial and satellite services.

BT is concerned to ensure that Ofcom should have the means to identify and prevent any attempt at spectrum hoarding or land grab by RSA applicants and consider that the fees structure should assist in this together with the fact that once an RSA application is coordinated, the RSA only applies to a spot location and not the geographic zone around the site in which interference sources are assessed.

Finally, BT also understands that the receive carrier frequencies of existing transmit/receive earth stations are protected by means of the transmit licence as long as the receive frequencies that need protection have been notified to Ofcom.

3. Answers to the questions in the consultation document

Technical and geographical parameters

Question 1: Do you agree with the list of proposed RSA parameters for assessing interference and for setting fees for receive-only earth stations? Are sufficient parameters defined for a grant of RSA? If you disagree, please give your reasons and suggest alternatives.

BT is in agreement with the proposed RSA parameters for assessing interference and setting fees for receive-only earth stations noting that the interference criterion relates to long-term interference and that no protection is offered to receive-only earth stations during short-term increases in interference from distant sources during anomalous propagation conditions.

Fees for RSA

Question 2: Do you agree with the proposals for introducing fees for RSA for receive-only earth stations in the bands concerned on the basis of parity with existing PES fees (with a minimum fee of £500) and that the full fees be implemented from the date of grant of RSA? If you disagree, please give your reasons and suggest alternatives.

BT supports the proposed fee structure based on parity with Permanent Earth Station fees noting that these fees are currently under review within the revised framework for Spectrum Pricing (SRSP).

BT understands that Ofcom would separately consult on extending RSA to other satellite space-to-Earth bands if they were to be considered for RSA and supports this approach.

Term of Grant

Question 3: Do you agree that grants of RSA in the bands should normally be on a rolling annual basis, with a 5-year revocation period?

BT is in agreement with this proposal.

Tradability and conversion

Question 4: Do you agree that grants of RSA in the bands should be tradable and that grants of RSA and WT licences should be inter-convertible? If so, do you agree with our proposal to model the process for trading and conversion on that for RSA for radio astronomy?

BT understands that Ofcom will allow trading and conversion of grants of RSA for receive-only earth stations under the procedure for trading as set out in the Wireless Telegraphy (Recognised Spectrum Access and Licence) (Spectrum Trading) Regulations 2009[1]. BT believes that converting an RSA grant for a receive-only service into a licence which permits transmissions is not a trivial undertaking and welcomes the fact that Ofcom will require the holder of the RSA grant to surrender it to Ofcom prior to Ofcom granting a new RSA or licence for the location. We are concerned that the proposed optional ability to convert an RSA into a WT act transmit licence that is alluded to within the consultation document is completely unclear in terms of the process that would be involved and the technical details. We do not believe that there is an existing case where this has been applied to RSA grants and would welcome more explanation and detail from Ofcom on the processes/procedures involved in this conversion so that other notified users of the spectrum in the locality are adequately protected (e.g. other operators' grants of RSA or other licensees). If Ofcom does intend to introduce such a facility then BT believes that a further consultation on detailed proposals would be necessary so that all parties can understand what exactly is proposed and can comment on the issues.

The process for granting RSA

Question 5: Do you agree with our proposed procedure for considering applications for the grant of RSA to receive-only earth stations. If you disagree, please give your reasons and suggest alternatives?

BT is in agreement with Ofcom's proposed procedure of assessing predicted interference against the Ofcom database of terrestrial links (e.g. point-to-point microwave links; BWA base stations) before granting RSA.

[1] http://www.opsi.gov.uk/si/si2009/pdf/uksi_20090017_en.pdf

The Case for Introducing RSA

Question 6: Do you agree that RSA for receive-only earth stations could provide greater security against interference and help promote optimal use of the 1690 - 1710, 3600 - 4200 and 7750 - 7850 MHz bands? If not, please explain why and describe any alternative mechanism that you consider to be necessary.

BT is in agreement with Ofcom's proposed procedure for enabling it to indicate the opportunity cost of spectrum by charging fees based on AIP (paragraphs 4.14– 4.20). BT agrees that this is conducive to the promotion of efficient spectrum use and provides a fairer scheme aligned with the terrestrial microwave services whose operators pay AIP-based fees.

The proposals will only promote optimal use of the bands if RSA applications are used for their intended purpose of providing protection to receive-only stations and not for land grab objectives.

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