

SAP REG / GVF RESPONSE

Question 1) Do you agree with our proposal to exempt users of HDFSS equipment operating with e.i.r.p. no greater than 55 dBW in the 27.50 to 27.8185 GHz, 28.4585 to 28.8265 GHz and 29.4625 to 30 GHz bands from the need to possess a wireless telegraphy licence?

SAP REG / GVF Response:

SAP REG / GVF agree with and supports Ofcom's proposals above. to exempt users of HDFSS equipment operating with e.i.r.p. no greater than 55 dBW in the 27.50 to 27.8185 GHz, 28.4585 to 28.8265 GHz and 29.4625 to 30 GHz bands from the need to possess a wireless telegraphy licence.

SAP REG / GVF note that various other EU/CEPT countries have taken action to enable licence exemption of Ka-band SITs up to circa 55 dBW – 60 dBW in the above (or similar bands). Ofcom's proposed action in this regard would therefore be fully consistent with the trend in other European countries and would support establishment of harmonised or near harmonised regulatory regimes across many European countries.¹

SAP REG / GVF therefore support Ofcom's assessment of the benefits of such action.

Ofcom may wish to note that various SAP REG / GVF member companies plan to develop and deploy Ka-band HD-FSS terminals with the capability to operate up to circa 55 – 60 dBW e.i.r.p. in the above referenced frequency bands to support two-way broadband service delivery in the context of addressing the UK Government's Digital Britain USC and NGA service objectives.

¹ SAP REG would respectfully invite Ofcom to consider raising the limit a bit higher, up to 60 dBW, in order to enable additional satellite terminal types to operate under license exemption.