Title:

Ms

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What do you want Ofcom to keep confidential?

Keep nothing confidential

Question 1: Are there any reasonable grounds why Ofcom should not grant the request to vary the five Wireless Telegraphy Third Generation Mobile Licences by increasing the permitted maximum in-band EIRP to 68dBm as soon as practicable? If so, please explain your reasoning for this:

Paradigm Services Ltd. is the operator of the Skynet constellation which provides satcom services to the UK MoD. There are currently six operational Skynet satellites. These satellites are controlled and monitored by S-band links: specifically, Earth to space links in the band 2025 MHz to 2110 MHz, and space to Earth links in the band 2200 to 2290 MHz.
Skynet is then an "adjacent band user" and Paradigm is concerned about the statements made at para 6.5 to 6.8. It is unclear how protection can be guaranteed given the proposed increase to the maximum in-band EIRP.

The telemetry & telecommand links are vital to maintaining the operation of the Skynet constellation, the impact of any out-of-band emissions must be considered thoroughly. The information provided in the consultation is not sufficient to convince Paradigm that such an increase would not have a negative impact to the operation of the Skynet network. Therefore, the request should NOT be granted at this time. Paradigm requests that Ofcom undertakes further action to ensure that, if there is an increase in the in-band EIRP, the protection of the telemetry and telecommanding links can be assured.

Question 2: Are there any reasonable grounds why Ofcom should not also apply the increased permitted maximum in-band EIRP to future 2 GHz MSS/CGC licences? If so, please explain your reasoning for this:

Ofcom should not apply the increased permitted maximum in-band EIRP to future licences so long as there is the possibility that it will disrupt telemetry and telecommanding of the Skynet satellite constellation. See Paradigm's response to Q1.