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ESOA MRF WG (09) 112

Cliff Mason
Riverside House,
2A Southwark Bridge Road,
London SE1 9HA
william.webb@ofcom.org.uk
cliff.mason@ofcom.org.uk

Dear Mr Mason

On 9 June 2009, Ofcom published a consultation document in view of collecting views from stakeholders following Freedom4 Limited ('Freedom4') request to Ofcom to vary its Wireless Telegraphy Public Fixed Wireless Operator 3.6 to 4.2 GHz licence ('3.6 GHz licence') in two ways:

- to increase the central station maximum power; and
- to remove the requirement to coordinate low-power terminals and allow them to be used for providing mobile services.

With this submission, ESOA supports the input made by SAP REG and the Global VSAT Forum and strongly objects to the proposal to vary the licence of Freedom-4 in order to allow BWA services and Mobile Services in frequencies above 3.8 GHz.

There is ample alternative spectrum available for such applications and neither the UK national frequency plan nor the EU Decision 208/411/EC foresee BWA usage in the 3.8-4.2 GHz band.

With regard to usage of spectrum below 3.8 GHz, ESOA request that the co-ordination procedure continues to be specified, including with earth stations located outside of the UK and terminal stations where FDD technology is used.

Aarti Holla-Maini
Secretary General
European Satellite Operators Association
+32. 2. 550 3575
aholla@esoa.net