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Office of Communications (Ofcom)

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Bob Philips
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Dear Sir,

Inmarsat Global Limited is pleased to provide input to Ofcom's statement and second consultation on proposals for "*Authorisation of terrestrial mobile networks complementary to 2 GHz mobile satellite systems*", published on 3 November 2008.

Inmarsat Global Ltd is a leading provider of global mobile satellite services, and has replied to the EU's call for applications in view of a selection and authorisation process related to the band 1980-2010 MHz – 2170-2200 MHz (S-band).

We would like to reiterate our appreciation for the thought leadership shown by Ofcom and for the focus on putting the full required legal framework in place in order for licences to be available to selected MSS operators from the date of the EU selection decision.

Since Inmarsat is participating in the EU selection process and authorisation process, it is indeed crucial to clarify and decide upon national conditions for the licensing of the CGC element in order to provide regulatory certainty and enable the attraction of business partners and finalisation of the necessary financial backing.

The main area of concern that remains for Inmarsat relates to the approach with regard to fees. Since this topic is specifically excluded from the scope of this particular consultation, our views will be submitted in a separate letter.

The replies below will focus on the questions asked in the Annex A6.1.

Question 1: Do you agree with our proposals for the detailed terms and conditions of the CGC Licence set out in this document or have any other comments on the issues raised in this document?

The detailed terms and conditions coincide with those Inmarsat has been promoting in earlier written input and we welcome in particular

- The decision to allow CGC roll-out in advance of the commercial launch of the satellite part by as much as 24 months
- The conclusion to authorise only the set of frequencies that the applicant applies to use for CGC in the UK,
- A way forward to authorise both the satellite and CGC operations so as to ensure that solely selected MSS operators are granted spectrum rights and this in an unambiguous and uncontested manner.

Inmarsat believes that Ofcom has struck the right balance between flexibility, encouragement for innovative services and avoidance of harmful interference.

Question 2: Do you agree with our proposed approach for including the conditions imposed by Decision No 626/2008/EC in the CGC Licence?

Inmarsat agrees with the approach towards the incorporation in the UK licences of the common conditions applied both to the successful MSS operator and the CGC licence itself, in accordance with the EU framework set by Decision No 626/2008/EC.

The initiative to authorise also the satellite service will contribute significantly to achieving coherence between ITU priority rights and rights of selected operators under the EU selection process. While we understand that a subsequent consultation will be organised at a later stage, we would like to already offer the following comments

- For 2 GHz the ESAP process has been instituted as a one-off. The general practice, apart from the 2 GHz case, will continue to be based on ITU first come, first served rules. Therefore, we would request to limit the authorisation of the satellite service to the particular case of MSS 2 GHz.
- We would advocate in favour of general authorisation, addressed to the selected MSS operators, rather than individual licence
- With regard to transfer of licence, concurring licences are the right mechanism to ensure that the CGC network is solely operated in synergy with the satellite network while allowing partners of the satellite operator to have adequate regulatory recognition and rights.

Question 3: Do you believe that the technical parameters used to define transmission rights should be based on spectrum usage rights or spectrum masks?

Inmarsat supports the use of spectrum masks

Question 4: Do you agree with our proposed SUR parameters for CGC?

We believe the testing requirements imposed by the SUR approach are complicated and add uncertainty to the process, hence we prefer the use of the spectrum mask approach”

Question 5: Do you agree with the spectrum masks parameters proposed?

Yes.

Question 6: Do you agree with the proposed changes to the other standard technical licence terms and conditions?

Yes, except the in-band power limits for CGC base stations, for which we propose (in line with the terrestrial 3G limits given in UK Interface Requirement 2019), 58 dBm/MHz EIRP. We also propose in addition a limit of 65 dBm/10 MHz to allow possible use of multiple wideband carriers. There does not seem to be any reason to apply limits tighter than those applicable to the terrestrial 3G bands. To the extent possible those limits should be relaxed to allow maximum flexibility for CGC operators.

Question 7: We have assumed that the CGC base station and user terminal characteristics will be similar to those for equivalent 3GPP equipment. Specifically, we have assumed a maximum transmitted power of 31 dBm/5 MHz for CGC handsets, and a maximum transmitted power of 61 dBm/5 MHz for the CGC base stations. Do you agree these are reasonable assumptions?

They are reasonable assumptions but we propose that the CGC base station limit be higher, as described above. The maximum power of 31 dBm/5 MHz for a CGC handset is a reasonable assumption, but note that the draft ETSI standard EN 302 574-2 allows for 39 dBm \pm 2.7 dB. The value of 31 dBm/5 MHz should not be viewed as a potential limit for CGC handsets. We assume a further consultation when the licence exemption regulations are being developed.

Question 8: We have based our analysis of compatibility between CGC and other radio systems on studies of analogous scenarios conducted for the 2.6 GHz award –

do you agree with this assumption?

Yes

Question 9: Do you have any comments on the assumptions of the deployed network modelled for the SUR parameters?

No

Please do not hesitate to contact us in case you have any further questions.

Sincerely

Ann Vandebroucke
Manager Regulatory and Policy Issues