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20 November 2007

Dear Sir,

Inmarsat, the world leading MSS satellite company, based in UK, welcomes the OFCOM consultation regarding “*Wireless Telegraphy Licence Exemption*”, and is pleased to provide comments, particularly regarding question 5 :

Question 5) Do you have any comments on our proposal to simplify the LMSS equipment listings in the Exemption Regulations and IR2016?

Inmarsat fully supports licence exemption or general authorisations as the most appropriate market access regimes for mobile satellite terminals.

We particularly welcome the simplification of the equipment listings in Schedule 5 part IV of the Exemption Regulations and within IR2016 Annex A by means of quoting the appropriate ETSI standard and the corresponding frequency and maximum transmit power requirements instead of referring to particular manufacturer and brand-name.

In a submission to a previous consultation on Wireless Telegraphy Exemption, issued on 14/07/2006 (ref G50022/06/0001), Inmarsat brought up that product, brand or manufacturer specific denominations lead to confusion and result in a very temporary solution. We therefore put forward the proposal

“ to evolve from a case-by-case approach and reference to brand names of terminals towards exemption on the basis of compliance with relevant values regarding

- *the particular assigned frequencies,*
- *the transmission power,*
- *the use of the equipment and*
- *the compliance with agreed national or international standards”*

The proposals for exemption included in the current consultation are fully in line with this thinking and therefore ensure that

1. the Regulation is neutral regarding brand names or commercial acronyms which are company specific
2. the imminent evolution of the technology and services is catered for, through a minimum number of Regulations
3. the Regulation is in tune with the generic framework, foreseen both by the Wireless Telegraphy Act and by the Telecommunications Act and
4. there is equal treatment for MSS and Inmarsat terminals in line with other types of exempted apparatus

The application is limited to land mobile terminals. Inmarsat believes that the need for licence exemption of maritime and aeronautical terminals equally exists. This is an equally international environment, uses the same co-ordinated frequencies and complies with internationally agreed standards. Moreover, these terminals will be in many cases covered by a ship radio licence or aeronautical certification by issued by specific national or foreign maritime and aeronautical authorities. No further licences under UK Wireless Telegraphy Act should be required. Furthermore, a regime of mutual recognition of ship radio licences and licences issued by aeronautical authorities should be introduced for foreign ships and aircraft. We would therefore urge OFCOM to extend the scope of application of the exemption Regulation.

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

Sincerely



Ann Vandebroucke
Manager Regulatory and Policy Issues.

