

## Consultation response form

### Background

1. Eutelsat Group was formed in September 2023 through the combination of Eutelsat, a global GEO satellite operator, and LEO constellation operator OneWeb – creating one of the world’s most innovative and experienced commercial satellite operators. The company is headquartered in Paris, with the centre of its Low Earth Orbit (LEO) operations based in London.
2. With a fleet of 37 geostationary satellites and a LEO constellation of more than 600 satellites providing capacity for broadcasters, media service providers, telecom operators, ISPs and governmental agencies, Eutelsat Group is the world's first satellite operator with an integrated GEO-LEO infrastructure. Our satellites are used for video broadcasting, satellite newsgathering, broadband services, data connectivity, connecting aviation and maritime, and enabling mission-critical government and NGO communications.

## Your response

Question	Your response
<p><b>Question 1: Do you have any comments on our proposals to gather additional antenna parameters, and would you prefer Ofcom to specify a small number of antenna pattern ‘envelopes’ or for users to provide details of the specific antenna parameters in use for Ofcom to assess? Please provide reasons for your views.</b></p>	<p>Confidential? – N</p> <p>Eutelsat Group supports Ofcom’s proposals to gather additional antenna parameters as this would allow to account for more user specific details in the coordination process. However, it is important that AAS antennas in particular do not benefit from any favourable regime as they do not necessarily allow for a reduction of interference levels into incumbents.</p> <p>We further agree that requesting applicants to provide specific performance details of their planned antenna systems already at the stage of application, would allow Ofcom to build a library of antenna parameters that would ultimately ease the coordination process.</p>
<p><b>Question 2: Do you have comments on the suggested approach to enable user-led coordination in certain circumstances?</b></p>	<p>We believe that implementing user-led coordination could pose a substantial burden on current spectrum users and prove challenging to administer effectively, especially given the extensive number of licenses issued already through the Shared Access framework by Ofcom (&gt;1500).</p>

	<p>Furthermore, such operator-to-operator coordination shall not lead to negotiating down protection levels of incumbent services, especially for satellite Earth stations.</p>
<p><b>Question 3: Do you have any comments on our proposal to increase the power level of our Low Power product by 3dBm in the 3.8-4.2 GHz band?</b></p>	<p>We believe that Ofcom’s proposal to increase the existing Low Power level by 3dBm should be delayed, considering ongoing work related to the EC mandate to CEPT and carried on jointly by PT1 and FM60 that is using the existing levels as reference.</p> <p>It would be more prudent to await the publication of the ECC report (anticipated by the end of Q1 2024) or, ideally, the subsequent CEPT report and ECC Decision on least restrictive harmonized conditions (expected in Q4 2024) for the shared use of the 3.8-4.2 GHz frequency band by terrestrial wireless broadband systems providing local-area network connectivity.</p> <p>This would ensure consistency with CEPT regulation, which is aiming to standardise and optimise the use of this band across Europe and to ensure protection and future evolution and development of incumbent users within the band and in adjacent bands, such as satellite Earth Stations.</p>
<p><b>Question 4 Do you have any comments on our proposal to remove the requirement for licensees holding a Low Power 3.8-4.2 GHz licence to keep a record of the address at which mobile terminals connected to an indoor base station will be used?</b></p>	<p>N/C</p>
<p><b>Question 5: Do you agree with our proposals to assume synchronisation between users, and coordinate base station to terminal instead of base station to base station in the 3.8-4.2GHz band? If no, please explain how other measures could increase sharing of the band.</b></p>	<p>N/C</p>
<p><b>Question 6. Please indicate whether you support our preferred option of coordination at -88 dBm/20 MHz (based on I/N of + 3dB, at 1.5m) or a more conservative alternative of -91 dBm/20 MHz (based on I/N of 0dB at 3m), with reasons for your view.</b></p>	<p>N/C</p>
<p><b>Question 7: Do you agree with our proposals for an increase in BEL in 3.8-4.2GHz? If no, are</b></p>	<p>We agree with the Ofcom’s proposals which seem logical.</p>

<p>there alternatives which you consider could better achieve similar results?</p>	
<p><b>Question 8: Do you agree with our proposal that adjacent band protection for Shared Access users is in future limited to considering only the first 5 MHz above and below UK Broadband assignments?</b></p>	<p>N/C</p>
<p><b>Question 9: Do you agree with our assessment that, in circumstances where localised shortages of spectrum have occurred, pricing can be used to influence requested spectrum amounts?</b></p>	<p>N/C</p>
<p><b>Question 10: Do you agree that we should take measures to reflect the impact of bandwidth, power levels and urban/rural location in our pricing approach for the 3.8-4.2 GHz band? Do you think there are other factors we should be taking into account?</b></p>	<p>We support Ofcom’s proposed revision of the applicable pricing framework as we believe that creating different price categories based on bandwidth, power levels, and urban/rural location would in principle help ensure proportional and appropriate use of the 3.8-4.2 GHz band by 5G verticals.</p> <p>However, it’s important to acknowledge that this method could potentially lead to reduced licensing fees in rural areas, resulting in a disproportionate impact on Fixed Satellite Services in those regions.</p>
<p><b>Question 11: How do you consider the illustrative prices would impact your spectrum requirements and future deployment plans in the 3.8-4.2 GHz band? Please provide evidence in support of your view.</b></p>	<p>N/C</p>
<p><b>Question 12: Do you have any comments on our proposals to clarify the circumstances in which exceptions are available, the tests we will apply, and how this supports user flexibility outside our overarching rules?</b></p>	<p>We fully agree with Ofcom’s proposals.</p>
<p><b>Question 13: Do you agree with our overall approach based around refining our existing coordination framework for Shared Access, whilst monitoring future opportunities for more user led and outcomes led coordination where evidence suggests it would be of benefit?</b></p>	<p>We have sympathy for the idea that the coordination framework should be flexible enough to enable more opportunities for new users and that amendments to the existing rules are needed to meet increased demand while supporting better sharing. However, noting that with a less cautious approach, interference risk might increase, it is essential that Ofcom take a proactive stance in monitoring and evaluating the real-world implementation of this approach in the coming years, with a commitment to conduct a review should any issues arise.</p>

	<p>Overall, we welcome Ofcom's commitment to avoid increasing risks and burdens on stakeholders, while maintaining a 'simple, user-friendly approach' to coordination. However, we call Ofcom to ensure that any measures adopted now could potentially accommodate future changes in other uses, including by satellite receiving stations.</p>
<p><b>Question 14: Do you agree with our assessment of the potential impact on specific groups of persons?</b></p>	<p>N/C</p>
<p><b>Question 15: Do you agree with our assessment of the potential impact of our proposal on the Welsh language? Do you think our proposal could be formulated or revised to ensure, or increase, positive effects, or reduce/eliminate any negative effects, on opportunities to use the Welsh language and treating the Welsh language no less favourably than English?</b></p>	<p>N/C</p>
<p><b>Question 16: Do you have any other comments on the proposals set out in this document?</b></p>	<p>We understand that this consultation aims mainly at reducing current constraints for private network deployment, but we call on Ofcom to remain mindful of what these new modifications could imply for incumbent users. As mentioned in the response to Question 3 above, we recommend that Ofcom wait until CEPT's current harmonisation work with respect to the 3.8-4.2 GHz band has been completed and finalised before introducing new technical criteria.</p>

Please complete this form in full and return to [sharedaccessresponses@ofcom.org.uk](mailto:sharedaccessresponses@ofcom.org.uk).