



Fountain Court, 2 Victoria Square,  
Victoria Street,  
St. Albans,  
Hertfordshire, AL1 3TF  
UNITED KINGDOM

**VIA E-MAIL**

3.6-3.8.GHz mobile [3.6-3.8.GHz.mobile@ofcom.org.uk](mailto:3.6-3.8.GHz.mobile@ofcom.org.uk) and Alberto Fernandes  
[Alberto.Fernandes@ofcom.org.uk](mailto:Alberto.Fernandes@ofcom.org.uk)

**15 December 2016**

**Ofcom  
2a Southwark Bridge Road  
London  
SE1 9HA**

**RE: Comments on Ofcom Consultation on Improving Consumer Access to Mobile Services at 3.6 to 3.8 GHz.**

The Global VSAT Forum (“GVF”) is pleased to express our views on Ofcom's consultation on Improving Consumer Access to Mobile Services at 3.6 to 3.8 GHz.

GVF is the leading voice of the international VSAT and satellite community. It is composed of members from every major region of the world and from every sector of the satellite industry, including satellite operators, manufacturers, system integrators and satellite service providers. GVF works with regulators around the world to design and promote regulatory structures that permit effective satellite services. A complete list of GVF members is available at:

<http://www.gvf.org/about-gvf/membersdirectory.html>

GVF membership includes all global satellite companies delivering essential communications services to modern societies using C Band radio frequencies in the 3400-4200 MHz band. These companies regularly attend the annual VSAT Global 2016 event held in London by GVF and Comsys in September (<https://tmt.knect365.com/vsat-global/>) and were again meeting at the GVF HTS London Roundtable 2016 in December (<http://www.icontact-archive.com/YaDOh0pPV3BYaZ1ULmguJ3wcNI6EW47L?w=3>) to discuss the continued role and development of the sector in Europe and other regions of the world.



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GVF fully endorses the views expressed by the EMEA satellite operators association (“ESOA”) that:

- The satellite industry is counting on continued access to the 3600 – 3800 MHz in future satellite deployments due to continued demand for satellite services.
- Most of the world’s coverage via C-band is anchored through FSS-ES which are based in Europe and the UK, and is used for intercontinental links and links with high reliability requirements (including broadcast distribution and TT&C).
- If the band 3.6-3.8 GHz band is to be made available for mobile broadband systems, then mobile broadband should be required to co-exist with FSS operations.
- GVF generally supports Option A, provided that new mobile licenses are subject to terms and conditions aimed at preventing interference to existing licensed satellite earth station receivers that are recognized and / or licenses by UK Ofcom.

GVF remains at Ofcom's disposal for any further consultation or discussion related to the practical aspects of ensuring the coexistence between FSS and IMT in this frequency band. The GVF agrees to its comments being available for public viewing on Ofcom’s website.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Hartshorn', with a horizontal line extending to the right.

**David Hartshorn**  
Secretary General  
Global VSAT Forum  
[David.Hartshorn@gvf.org](mailto:David.Hartshorn@gvf.org)