

19/11/2019

Ref: Update to Foreign Space Objects Determination

Dear Sir/Madam,

Foxtel welcomes the opportunity to comment on the Australian Communications and Media Authority (ACMA) Discussion Paper 'Update to Foreign Space Objects Determination'.

Foxtel notes that the update to the Foreign Space Objects Determination arises from requests from foreign satellite operators for regulatory approval to operate their services in Australia. We welcome the willingness of these operators to comply with local planning regulatory frameworks, as this provides opportunities for the ACMA to consult with affected stakeholders and to appropriately manage the risk of interference to existing spectrum users.

As noted in the Discussion Paper, relevant ITU filings for SpaceX and Kepler include the Ku frequency bands 10.7 – 12.7 GHz. As the ACMA would be aware, Foxtel utilises GSO systems in the Ku Band DTH 11.7 – 12.7 GHz for the delivery of our products to our satellite customers. This is a crucial link in our product delivery chain, and the consequences of interference, outages or degradations of margin are at the highest end of the spectrum of consequences for a business such as Foxtel. We hold very high levels of concern regarding the interference potential of NGSO constellations.

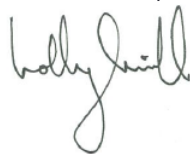
Given the potential catastrophic business impact of interference, the need to protect existing GSO systems from these new NGSO constellations must be a priority for the ACMA going forward.

Whilst not a matter of direct relevance to the proposed update to the Foreign Space Objects Determination, Foxtel would like to note on record the importance of ensuring that any future licences issued by the ACMA should reference the ITU Radio Regulations for the protection of fixed GSO satellite services from non-GSO systems (RR22.2), and in particular the recommendations in ITU-R BO.144 and ITU-R BO.1517 and any other relevant recommendation.

Foxtel would also like to express its strong interest in participating in the Technical Liaison Group process that will presumably accompany moves to licence NGSO constellations.

Thank you again for the opportunity to comment on the Discussion Paper. If you have any questions or would like further information, please do not hesitate to contact me (holly.brimble@foxtel.com.au).

Yours Sincerely,



Holly Brimble
Manager, Policy and Regulatory Affairs

5 Thomas Holt Drive
North Ryde, NSW 2113
Australia

T +61 2 9813 6000

GPO Box 151
North Ryde
NSW 1670

Foxtel.com.au