8 March 2022

The Manager

Space Systems Section

Australian Communications and Media Authority

PO Box 78

Belconnen ACT 2616

RE: Draft Radiocommunications (Foreign Space Objects) Amendment Determination 2022 (No. 1)

Dear Sir/Madam,

Omnispace LLC ("Omnispace") sincerely appreciates the opportunity to submit a response to the Australian Communications and Media Authority’s Consultation, “Update to Foreign Space Objects Determination - 03/2022.” Omnispace is pleased to be added to Schedule 1 of the Radiocommunications (Foreign Space Objects) Determination 2014 and strongly supports its addition to the list.

Omnispace operates an operational MEO global non-geostationary orbit (“NGSO”) satellite system in the 2 GHz S-band (1980-2025 MHz Earth-to-space / 2170-2200 MHz space-to-Earth). In Australia, Omnispace has an operational satellite Earth station at Ningi QLD with MSS feeder links for its F2 satellite network in the 5 GHz and 7 GHz frequency bands. Ningi also provides Fixed Satellite System (FSS) feeder links for the ASIABSS satellite network in the 7 GHz segment.

The addition of Omnispace on the Australian Foreign Space Objects Determination List will benefit Australia as Omnispace’s current operational MEO non-geostationary orbit (“NGSO”) satellite system in the 2 GHz S-band is already providing mobile satellite service on an experimental basis in Victoria, Australia, and is ready to provide service throughout Australia.   Omnispace is investing in new technology and infrastructure as part of its next generation global constellation designed to provide hybrid 5G connectivity. The Omnispace network will power critical global communications, including 5G Non-Terrestrial Network (NTN) and Internet of Things (IoT) connectivity, directly from its satellites in space to mobile devices around the world.  Omnispace is building upon the investments it has already made to validate 3GPP standards-based 5G products and technologies and to demonstrate 5G connectivity from space.  Omnispace’s hybrid MSS system can provide a broad range of services of interest to Australia, including a wide array of possible commercial and government communications in the areas of agriculture, mining, fishing, emergency response, public safety, and logistics in rural and isolated areas lacking in coverage.

Thank you again for the opportunity to provide comments on the “Update to Foreign Space Objects consultation – 3/2022.”

Please contact me should there be a need for clarification or additional information.

Sincerely,



Les Davey

Managing Director

Omnispace Australia Pty Ltd

ph: 0418 312 134