

29 April 2022

The Manager
Spectrum Licensing Policy Section
Australian Communications and Media Authority
PO Box 13112
Law Courts
Melbourne Vic 8010

Dear Madam/Sir,

Reply to Draft Five-year spectrum outlook 2022-27 – Consultation 12/2022

Telesat thanks the Australian Communications and Media Authority (“ACMA”) for the updated annual Five-year spectrum outlook 2022-27 (FYSO) which provides a broad overview of ACMA’s plans for future spectrum allocations and regulatory decisions.

As the ACMA has rightfully acknowledged in the draft FYSO, demand for non-geostationary satellite services is expected to increase and evolve over the years as more users utilise real-time and latency-sensitive applications. Since 2020, ACMA has engaged the industry to solicit feedback and implemented several changes in the satellite licensing regimes and taxes particularly in the 28 GHz frequency band.

With the implementation of the revised licensing regime, satellite gateway earth stations may now be licensed in the 28 GHz through the Area-Wide Licences with significantly reduced taxes. Furthermore, modifications to the Business Operating Procedure enabled an interim arrangement for the submission and processing of applications for space and space receive apparatus licences authorising the use of earth stations in motion communicating with NGSO space stations in parts of the 18-20 GHz and the 27.5-29.5 GHz frequency bands. Overall, the ACMA is one of the leading administrations in pioneering regulations on NGSO satellite technology in the Asia Pacific region and this provides much certainty to the investment made to NGSO satellite constellations, such as Telesat Lightspeed™.

Telesat is also of the view that the ACMA has taken a balanced and innovative approach in considering the demands from both the terrestrial and satellite industries.

Telesat understands that subsequent revisions to the earth stations in motion communicating with NGSO satellites in the Ka-band would likely be made after the World Radiocommunication Conference in 2023. On the other hand, Very Small Aperture Terminals (VSATs) communicating with NGSO satellites should be allowed for use under the current provisions in the Radio Regulations with similar licensing conditions as to VSATs communicating with geostationary satellites.

Overall, Telesat is heartened with the pace and timely review of ACMA's satellite licensing regulations and, aside from what mentioned above, has currently no further suggestions for additional regulatory interventions.

Should there be any clarifications required on any of the comments within this letter, please feel free to contact the undersigned.

Thank you.

A handwritten signature in black ink, appearing to read 'Zhi Guo', is displayed on a light gray rectangular background.

Lim Zhi Guo
Market Access & Spectrum Policy, APAC
zlim@telesat.com