

Inmarsat response to
ACMA proposed changes to apparatus licence pricing structures
4 May 2023

Inmarsat welcomes the opportunity to comment on the Australian Communications and Media Authority (ACMA)'s proposed changes to apparatus licence pricing structures (March 2023). Inmarsat is of the same views with the members of the Communications Alliance Satellite Services Working Group (SSWG).

Inmarsat is in particular concerned with the “interference protection pricing” and “pricing for varying levels of interference”.

Inmarsat's concern with applying “pricing for varying levels of interference” to satellite earth receive apparatus licences is that it is focussing on narrowly on the spectrum framework. A more sensitive receiver does not necessarily equate to poor spectrum efficiency. A more sensitive earth station receiver has the benefit of requiring a lower power from the space station transmitter at the other end of the link. ACMA acknowledges the benefits of reducing transmitter power to reduce the level of potential interference, and this improvement in the interference environment should not be penalised by increasing the fees for earth station receivers which may enable this interference improvement. There is a potential second benefit of reducing the required transmitter power – that there is an overall power reduction, saving energy resources, which is an issue of increasing importance to the telecommunications industry. It is therefore important to examine the overall consequences of such a policy – not just to focus on one part of the spectrum framework.

“Interference protection pricing” assumes that satellite operators “may be satisfied with lower levels of protection”. Inmarsat provides important communication services to its customers and are bound with service level agreements which specify high levels of availability and performance which correspond to the need for a reliable service that operates free of harmful interference. Therefore, Inmarsat cannot support “interference protection pricing” as a factor for earth station receiver licence fees.

Australia's space system apparatus licence fees charged by population density area (high, medium and low where earth stations are located) for L-band, C-band and Ka-bands are considered high compared with other countries. The ACMA should consider giving significant incentive to satellite operators by adjustment of the apparatus licence tax regime instead of any additional pricing measures or any increase of licence tax, to encourage the ongoing operation of satellite gateways in Australia.
