

Inmarsat and Intelsat appreciate the opportunity to be involved in the review of ACMA's frequency assignment and coordination instructions. Of particular interest are instructions that relate to the protection of existing and planned FSS earth and space stations and ongoing access to bands allocated to FSS.

The table below lists the RALIs they would appreciate being involved in as part of the consultation you mentioned. The right most column provides comments on Inmarsat's and Intelsat's interests. As was noted in ACMA's draft review work program, a number of the RALIs will require input from the TLG (3400-4000 MHz) in which Inmarsat and Intelsat are participating. We have suggested that FX03 will also be such a case.

We look forward to being involved in the review and updating of the listed documents.

Identifier	Title	Revision required?	Expected timeframe for undertaking revision	Comments - Inmarsat and Intelsat
FX03	Microwave fixed services frequency coordination including information on RPE data files	Yes	Q3–Q4 2021	Intelsat and Inmarsat will review details as part of the TLG process for 3700-4200 MHz. Intelsat and Inmarsat would support coordination processes and protection criteria being included between FSS and FS in this RALI (e.g. 3580-4200 MHz & 5925-6425 MHz C-bands, 10.7-11.7 GHz, 12.75-13.25 GHz Ku-bands, 17.7-19.7 GHz, 27.5-29.5 GHz Ka-bands etc) from the relevant ITU-R Recs. including ITU-R SF.1006 & SM.1448-1. Protection of FSS feeder links are particularly important to Inmarsat and Intelsat. See MS45 for relevant level of details.
FX14	Point-to-multipoint fixed services in specified parts of the 3.4–3.5 GHz band	Planned for suppression	3400-4000 MHz TLG process commenced Q2 2021, finishing Q4 2021	Intelsat has particular interest in the coexistence between PMP and other services. Intelsat requests to be involved in the review of the document that replaces FX14 in this area.
FX19	Frequency coordination and licensing procedures for apparatus licensed broadband wireless access services in the 1900–1920 and 3575–3700 MHz bands	Yes	3400-4000 MHz TLG process commenced Q2 2021, finishing Q4 2021	Inmarsat and Intelsat will review details as part of the TLG process. This includes protection criteria for 3575-4200 MHz ES RXs (incl guard bands, interference thresholds, separation distances and emission masks).
MS38	Coordination between earth station transmitters in the fixed-satellite service and other services in the 25.5–30 GHz band	Yes	Q3–Q4 2021	Inmarsat and Intelsat request to be involved in the review of this document.

Identifier	Title	Revision required?	Expected timeframe for undertaking revision	Comments - Inmarsat and Intelsat
MS39	Frequency coordination and licensing procedures for apparatus licensed public telecommunications services in the 3.5 GHz band	Planned for suppression	3400–4000 MHz TLG process commenced Q2 2021, finishing Q4 2021	Inmarsat and Intelsat will review details as part of the TLG process.
MS44	Frequency coordination procedures for the earth station protection zones	Yes	Q3-Q4 2021	As users of ESPZs, Inmarsat and Intelsat request to be involved in the review of this document.
MS45	Frequency coordination requirements between microwave fixed point to point links and FSS earth stations	Yes	Q4 2021-Q1 2022	Inmarsat and Intelsat request to be involved in the review of this document. Protection of FSS feeder links are particularly important to Inmarsat and Intelsat in the 5925-6425 MHz band.
MS46	Licensing and coordination procedures for area-wide apparatus licensed services in the 26/28GHz bands	Yes	Q3-Q4 2021	Inmarsat and Intelsat request to be involved in the review of this document. Of particular interest is development to the current AWL arrangement.
MS03	Spectrum Embargoes	Yes	Next 12 to 18 months	Intelsat and Inmarsat request to be involved in the review of Embargoes that impact FSS/MSS: Embargoes 23 (MSS), 42 (FSS), 48 (FSS), 72 (FSS), 78 (FSS), 79 (FSS). Embargo 78 needs to be amended now to allow new FSS assignments in the 3800-4000 MHz range, especially at existing earth station sites, now that ACMA has released their 'Replanning the 3700-4200 MHz band Outcomes paper'.

Inmarsat and Intelsat as members of the Communications Alliance Satellite Services Working Group (CA SSWG) support the similar input document they have sent on the same topic.