
Rivada Space Networks:

Response to Consultation paper on
proposed updates to the Australian
Radiofrequency Spectrum Plan



Thank you for the opportunity to provide comments on proposed updates to the Australian Radiofrequency Spectrum Plan. Rivada Space Networks (“Rivada”) appreciates ACMA’s dedication to maintaining an up-to-date regulatory framework that aligns with international Radio Regulations and supports Australia’s connectivity goals.

1. Introduction to Rivada Space Networks

Rivada is building the world’s first truly global NGSO satellite network, known as the Rivada Outernet, designed for secure, low-latency point-to-point and point-to-multipoint data connectivity for businesses and governments. Unlike other NGSO operators, Rivada’s model does not provide public internet over satellite; instead, we offer wholesale data connectivity solutions via our locally licensed partners without relying on terrestrial infrastructures, gateways or direct internet connections.

The Rivada Outernet is comprised of a secure Low-Earth Orbit (LEO) satellite constellation consisting of 300 satellites providing pole-to-pole coverage, with planned expansion to 600 satellites to ensure capacity and latencies comparable to terrestrial fibre. This fully laser-linked constellation, combined with intelligent on-board routing, enables gateway-free communication from origin to destination, minimising dependence on third-party infrastructure or terrestrial networks.

Rivada’s network is accessed via user segments operating within the full Ka-band spectrum in alignment with national frequency allocation plans:

- **Downlink:** 17.3-20.2 GHz
- **Uplink:** 27.5-30.0 GHz

The user segment comprises terminals from multiple vendors, which will be obtained, installed, and operated by Rivada’s locally licensed partners. While Rivada’s network does not directly interconnect with the internet, local service providers have the flexibility to do so at their discretion and responsibility, allowing for compliance with Bangladesh’s security and regulatory requirements.

2. Rivada’s Response

Question 1

The ACMA seeks comment from interested parties on Chapter 1 – General information.

Rivada Response to Question 1:

Rivada has no specific comment on the changes to Chapter 1 – General information.



Question 2

The ACMA seeks comment from interested parties on Chapter 2.

Rivada Response to Question 2:

In Chapter 2 – Part 2, under Column 2, Australian table of allocations, Rivada supports the proposed changes which reflect the changes to the Radio Regulations outlined in the Final Acts of WRC-23, as well as new Australian footnotes, in particular, regarding:

"New arrangements for aeronautical and maritime earth stations in motion communicating with non-geostationary space stations in the fixed-satellite service in the frequency bands 17.7–18.6 GHz, 18.8–19.3 GHz and 19.7–20.2 GHz (space-to-earth) and 27.5–29.1 GHz and 29.5–30 GHz (earth-to-space) via international footnote 517B (as an outcome of WRC-23 agenda item 1.16)."

Similarly, Rivada supports the proposed additional changes to Column 2 that are not related to WRC-23 outcomes, in particular, regarding:

"Addition of new Australian footnote AUS108 to facilitate land-based earth stations in motion in the frequency bands 27.5–29.1 GHz and 29.5–30 GHz. This addition, along with the addition of international footnote 517B will make permanent arrangements to replace a current subsection 10(10) decision."

In Chapter 2 – Part 3: Australian footnotes, we support the changes related to Australian footnotes, specifically the proposed new Australian footnote AUS108 to make permanent arrangements to replace current subsection 10(10) decisions, i.e.:

"land-based earth stations in motion in the frequency bands 27.5–29.1 GHz and 29.5–30 GHz (AUS108)."

Question 3

The ACMA seeks comment from interested parties on the proposed action for decisions previously made by the ACMA under subsection 10(10) of the spectrum plan.

Rivada Response to Question 3:

As was stated in our answer to Question 2, Rivada supports the addition of international footnote 517B and Australian footnote AUS108 in providing permanent arrangements for the use of both fixed earth stations and earth stations in motion in the frequency bands 27.5–29.1 GHz and 29.5–30 GHz. Should the aforementioned changes be implemented, we see no reason why the related decision made under subsection 10(10) should not be revoked.