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[redacted]

By electronic submission to:

ACMA

Luxembourg, 1/05/2026

Subject: **Responses from OQ Technology to Five-year spectrum outlook 2026–31 and 2026–27 work program – Draft for consultation**

Dear ACMA,

OQ technology thank ACMA for giving a chance to comment on the Draft five-year spectrum outlook 2026–31. We would particularly like to highlight our interest in the 2 GHz MSS band and the proposed next steps.

OQ Technology welcomes ACMA's efforts to enable Mobile Satellite Services (MSS) in the 2 GHz band and supports timely access to this spectrum to accelerate innovative satellite-based connectivity solutions, including direct-to-device and IoT services.

However, OQ Technology does not support the use of a price-based auction mechanism for the allocation of MSS spectrum.

Satellite services differ fundamentally from terrestrial mobile services in ways that make auctions ill-suited:

- Global, not national assets: Satellite systems are designed and financed on a global or regional basis, not country-by-country. Fragmented national auctions risk undermining the viability of globally harmonised MSS systems and create regulatory uncertainty for operators investing at scale.
- High upfront investment and long lifecycles: MSS networks require significant upfront capital expenditure and long development timelines, often spanning 10–20 years. Imposing high auction costs diverts capital away from infrastructure deployment and service innovation, ultimately slowing market development.
- International precedent: In several jurisdictions, including the United States, regulators have moved away from auction-based allocation for satellite spectrum, recognising that

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administrative or coordinated licensing approaches better support efficient use and public benefit.

- Need for coordinated spectrum use: MSS requires close coordination with ITU filings and existing satellite networks. Administrative assignment allows regulators to assess technical compatibility, service commitments, and public interest outcomes more effectively than purely price-based mechanisms.

For these reasons, OQ Technology strongly encourages ACMA to adopt an administrative (merits-based) allocation framework, selecting operators based on demonstrated capability, technical readiness, and commitment to delivering services that benefit Australia.

Such an approach will better ensure rapid deployment, efficient spectrum use, and alignment with global satellite ecosystems.

We will, of course, provide further comments once the consultation on the draft allocation instruments is published later this quarter.

Yours faithfully,

Omar Qaise - Founder & CEO [redacted]

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