

11 August 2017



Mark Arkell

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Dear Mark,

RE: Regulatory arrangements for GSO and NGSO ESIMs

The Communications Alliance Satellite Service Working Group (SSWG) welcomes the opportunity to provide comments on the ACMA *Regulatory arrangements for GSO and NGSO ESIMs - Proposed decision under subsection 10(10) of the Australian Radiofrequency Spectrum Plan 2017 and licensing procedures Consultation* paper.

The SSWG recognises the priority that the ACMA has afforded to this work item, with an expected completion timeframe of Q4 2017 as per the ACMA's *Spectrum management work program* in the *Five-year spectrum outlook 2016–20*. This is very welcomed by the industry.

The SSWG is pleased to see that the ACMA has taken this initiative and the SSWG supports the interim measures which are proposed, noting that some of the measures appear to be somewhat onerous for industry to implement, for example the evidence of consultation. The SSWG understands the constraints being faced by the ACMA with a solution that depends on current class licensing arrangements and recent flexibility available with subsection 10(10) of the *Australian Radiofrequency Spectrum Plan 2017*.

The SSWG also notes intention of the ACMA to further review procedures for the use of ESIMs in Australia after the WRC-19 Conference which will focus on these matters (WRC-19 Agenda Item 1.5). The SSWG supports and agrees with this proposal for a future review, which should have the potential of making additional parts of the Ka-band available for ESIMs in Australia, and potential removal of some of the interim arrangements.

If you have any further questions with regards to this response, please contact Mike Johns on (02) 9959 9125.

Yours sincerely,

A handwritten signature in black ink, appearing to read "John Stanton". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

John Stanton
Chief Executive Officer