

12 April 2021



Alex Seneta

Executive Director, Office of the Space Regulator
Australian Space Agency

Dear Alex

RE: Consultation on Implementing Partial Cost Recovery charges – Launches and Returns

The Communications Alliance Satellite Services Working Group (SSWG) welcomes the opportunity to comment on the Australian Space Agencies' consultation on *Implementing Partial Cost Recovery*.

The SSWG generally supports the proposal in the Australian Space Agency's proposals for the recovery of costs by Government for work on Australian and Overseas Permits. The SSWG cautions, though, that attention should be paid to keeping costs as low as possible, lest the overall fee and tax impost of satellite systems operation becomes a barrier to entrants. While the ACMA has made some welcome progress on spectrum fees recently, overall spectrum charges in Australia are prohibitive in comparison to fees applicable in many other national markets.

The SSWG is satisfied with the fees proposed for single GSO networks. There is, however, concern with regards to the application of the fees for permits when authorisation for number of identical NGSO satellites on a single launch vehicle is being sought for a launch under a single permit. In such cases, the SSWG believes that a single fee for a single launch should be charged. This approach is reasonable since in this case the Agency is only examining a single satellite type on a single launch vehicle and the application for each of the satellites is effectively identical.

For example, the Belgian regulator (BELSPO) has granted the following licences which cover multiple satellites on a same launch vehicle:

- a licence granted to Von Karman Institute on 20 February 2017 to cover 21 satellites: <http://www.belspo.be/belspo/space/objects.asp?l=en&info=auth&r1=2017&r2=01> ;
- a licence granted to Von Karman Institute on 5 May 2017 to cover 7 satellites: <http://www.belspo.be/belspo/space/objects.asp?l=en&info=auth&r1=2017&r2=02> ; and
- a licence granted to Von Karman Institute on 19 June 2014 to cover 3 satellites: <http://www.belspo.be/belspo/space/objects.asp?l=en&info=auth&r1=2014&r2=01> .

The fee for each application for a licence is set at €1,000 in Belgium under Article 13 of the Royal Decree implementing certain provisions of the Law of 17 September 2005 relating to

launching, flight operations or guidance of space objects, which is accessible at: http://www.belspo.be/belspo/space/doc/beLaw/AR_spatial_fr.pdf .

Based on this, the SSWG supports the Agency's proposals but seeks a clarification that for launches involving identical satellites on a single launch vehicle that only the fee for a single satellite network for launch will be charged.

If you have any questions with respect to this submission, please contact Mike Johns at Communications Alliance on 0414 898 841.

Yours sincerely,



John Stanton
Chief Executive Officer

About Communications Alliance

Communications Alliance is the primary telecommunications industry body in Australia. Its membership is drawn from a wide cross-section of the communications industry, including carriers, carriage and internet service providers, content providers, equipment vendors, IT companies, consultants and business groups. Its vision is to provide a unified voice for the telecommunications industry and to lead it into the next generation of converging networks, technologies and services. The prime mission of Communications Alliance is to promote the growth of the Australian communications industry and the protection of consumer interests by fostering the highest standards of business ethics and behaviour through industry self-governance.

For more details about Communications Alliance, see:

<http://www.commsalliance.com.au/>