



Satellite Licensing Framework Consultation - GCRA

Eutelsat's submission - 10/2/22

Eutelsat, one of the world's leading satellite operators, would like to thank the Guernsey Competition and Regulatory Authority (GCRA) for opening for comments its proposals regarding satellite licensing in Guernsey.

As a response to question 3, Eutelsat provides below comments regarding the proposed two-stage process to grant a telecommunication license and to allow access to spectrum for satellite services in Guernsey.

Eutelsat understands that there has been interest expressed in providing NGSO (non-geostationary satellite orbit) satellite services over Guernsey, but that the separation distance needed between NGSO gateways to avoid harmful interferences may imply that only one of these gateways could be established in Guernsey.

While the issue of interference may arise in the case of NGSO gateways, the situation of user terminals of satellite services is different, and terminals from different satellite systems can coexist as long as these satellite systems are compliant with the coordination process at International Telecommunications Union (ITU) level. As a consequence, Eutelsat is of the view user terminals should not be included in the proposed two-stage process to access spectrum and that the current Ofcom rules should simply be applied for the licensing of these stations.

Eutelsat would like to highlight that if only one gateway can be established in Guernsey, it does not mean only one NGSO satellite system can provide services in Guernsey. As explained in the previous paragraph, user terminals from several satellite systems can coexist in Guernsey. Services from different satellite systems can therefore be provided in Guernsey through gateways located elsewhere, thanks to the large coverage of satellites. Eutelsat thus sees no need to limit the number of authorized satellite telecommunication systems and service providers.

Even though Eutelsat understands the specific situation of Guernsey, a competitive process to grant access to spectrum is very peculiar for satellite services. Eutelsat encourages the GCRA to consider alternative solutions. If the Authority decides to pursue with this two-stage process, Eutelsat therefore invites the GCRA to emphasize in its official publications the reasons why a competitive process is necessary, and no alternative is workable.

Additionally, Eutelsat would like to ask confirmation that the proposed framework will not be applied to GSO (geostationary satellite orbit) satellite services, gateways and user terminals, that can coexist with other GSO and NGSO satellite services as long as the satellite systems are compliant with the coordination process at ITU level.



Eutelsat would also like to comment that it would be beneficial to postpone the Expression of Interest (stage 1), while waiting for feedbacks on the two-stage process from the stakeholders responding to this consultation.

Eutelsat hopes the GCRA will consider the above elements and looks forward to seeing the conclusions of this consultation. Eutelsat remains at your disposal should the GCRA have further questions on this contribution.

Respectfully submitted,

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