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2 May 2023

EETT Consultation on Amendment of the Radio Spectrum Terms of Use Regulation

GSOA would like to thank the national regulator of Greece, EETT, for the opportunity to provide comments on their public consultation to amend the Regulation on the conditions of use of radio spectrum (the "Consultation").[1]

GSOA[2] is the CEO-driven association representing global and regional satellite operators, and it provides a platform for collaboration between satellite operators globally and a unified voice for the sector. Our vision is to help policymakers improve the state of the world by continuously bridging digital, education, health, social, gender and economic divides across diverse geographies and across mature and developing economies.

The satellite communications sector is going through several major innovation trends. Non-geostationary systems, using Medium-Earth-Orbits (MEO) and Low-Earth-Orbits (LEO), have deployed that are capable of providing unprecedented connectivity levels, including for very high-gigabit capacity, low-latency applications. Geostationary (GEO) platforms have been also subject to strong capacity enhancements driven by a systematic digitisation of space technologies, the 'softwarisation' of satellite operations and other virtual network functions. Combined with the advent of new ground antennas and reliance on steerable spot beams using various frequency bands, these developments have greatly increased satellite systems' capacity and flexibility in geographical coverage and spectrum use.

GSOA very much appreciates and welcomes that EETT is taking the initiative of clarifying and updating the licensing conditions applicable to satellite services using the FSS Q/V-band spectrum, as well as a few other updates applicable to other FSS bands (notably for the Ka-band). In particular, GSOA understands that EETT is implementing the relevant CEPT / ECC Decisions, Recommendations and Reports with regard to the procedure for determining the conditions of availability of the 47.2- 50.2 GHz (Earth-to-space), 50.4 – 52.4 GHz (Earth-to-space) and 37.5 – 40.5 GHz (space-to-Earth) for the Fixed Satellite Service (FSS) and the Mobile Satellite Service (MSS) in the 39.5 – 40.5 GHz band as well as the conditions of use for the 40.5 – 43.5 GHz band, which is intended for future use by MFCN networks and FSS/BSS networks. These Q/V bands will become essential to the development of satellite systems in Europe and other parts of the world in a very near future, and new satellites are being designed and constructed with capacity using these frequencies. Some GSO FSS satellites utilising Q/V band in Europe are already in operation and more will be launched in the coming years.

[1] Available from: Public consultation: Amendment of the Spectrum Terms of Use Regulation - EETT | National Telecommunications & Post Commission

[2] The members, activities, and other details about GSOA can be found at www.gsoasatellite.com

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To our knowledge, Greece is the first CEPT country to implement the new ECC deliverables on Q/V bands in national regulations and GSOA congratulates EETT for taking the lead. Overall, we subscribe to EETT's approach. Nonetheless, GSOA would like to highlight a few points of importance:

- On **page 25** of the Consultation – for the band 39.5-40.5 GHz, coordinated Earth stations are proposed to be limited only to rural areas. Since this band is intended as an exclusive satellite band, there is no need for any location restrictions and we respectfully ask for this limitation to be removed, so that coordinated earth stations may be deployed in all areas.
- The band 40.5-43.5 GHz is missing from **Annex A.5** and should be added for use by FSS and BSS Earth stations in the space-to-Earth direction (40.5-42.5 GHz) and FSS Earth stations in the Earth-to-space direction (42.5-43.5 GHz). We respectfully ask for this band to be opened for coordinated and uncoordinated satellite earth stations, on a shared basis with MFCN. Indeed, these satellite usages of the band 40.5-43.5 GHz are consistent with ECC Decision ECC/DEC/(22)06 which designates the band for MFCN on a shared basis with satellite applications. The Decision states in its Decides 5: "*that this Decision does not preclude the use of the band by other services to which the band is allocated, and administrations should maintain the possibility of existing and future FSS earth stations to operate in the band accordingly;*". A new ECC Decision is currently being worked on by CEPT project team FM44 that is planned to designate the band 40.5-42.5 GHz for FSS and BSS Earth stations and the band 42.5-43.5 GHz for FSS Earth stations. Although the CEPT framework is not fully complete at this time, EETT is invited to already add the band 40.5-43.5 GHz to Annex A.5, in order to avoid having to revisit the regulations at a later date.
- In section 7 of the Consultation (**Annex B.28**), EETT proposes the condition of requiring information on the location and characteristics of satellite earth stations in 39.5-40.5 GHz and 40.5-43.5 GHz to be shared with MFCN networks, for the protection of the earth stations from OOB emissions from MFCN base stations. CEPT Recommendations (22)01 and (22)02 consider it important that MFCN operators and satellite operators provide data on the locations of their stations in order to resolve/prevent any interference issues. It would be very useful to introduce such information exchange to help limiting interference risks. We therefore respectfully ask for a reciprocal requirement on the MFCN operators to provide similar data on the location of MFCN base stations so that satellite operators are also able to take account of any deployed MFCN systems.

GSOA encourages EETT to take these points in consideration for the implementation of the relevant ECC texts into the Radio Spectrum Terms of Use Regulation.

GSOA again thanks EETT for proposing these important changes and providing the opportunity to comment. GSOA members remain at your disposal for any further discussion on this important initiative.