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Προς
ΕΕΤΤ

**Θέμα : Δημόσια Διαβούλευση αναφορικά με την τροποποίηση του Κανονισμού
Όρων Χρήσης Ραδιοφάσματος**

INTRACOM TELECOM recognizes that telecommunication satellite systems, and particularly mega-cluster Low Earth Orbit (LEO) satellite systems, have been shown, up to now, to be a viable connectivity enabler for the delivery of useful Internet / multimedia services to terrestrial users. Such systems can provide global coverage and are especially effective in case of hard-to-reach rural areas, while also offering an inherent robustness in the provision of service in cases of natural disasters. The E-Band, due to its radio-capacity advantages, may, under suitable conditions, allow the establishment of high-capacity Earth Gateway to satellite links. It is understood that the use of high-capacity E-Band links, in that context, can facilitate the delivery of relatively high-capacity access services to a larger number of subscribers, while helping alleviate the possible congestion of traditional frequency bands used for Earth to Satellite (E to s)/ Satellite to Earth(s to E) communication.

We note, that the ITU regulation defines the 71-76 GHz sub-band for “s to E” communication and 81-86 GHz sub-band for “E to s” communication. In the EETT consultation document however, the provision is for E to s for both sub-bands.

E-Band Point-to-Point radios, due to their large capacity, 10Gbit/s and beyond, have proven in the last decade to be the best wireless alternative to optical fiber for establishing multi-gigabit terrestrial transport connectivity links for terrestrial fixed and mobile networks. The E-band is already used extensively and increasingly, for Point-to-Point wireless transport links by Mobile operators, for 5G / 5G+ mobile base station backhauling as well as terrestrial service Fixed Wireless Access (FWA) operators and Internet Service Providers (ISP). The industry consensus is that E-Band’s use will continue to be pivotal for terrestrial transport services and will increase in the future as 6G is emerging.

INTRACOM TELECOM, being a manufacturer and global supplier of high-performance E-Band radios for terrestrial fixed service, considers that it is important to protect the existing services in the E-Band, and the operators that are deploying them legally, from service impairment due to interference from the use case in discussion.



INTRACOM TELECOM is aware that a prominent LEO satellite cluster operator uses E-Band links for Earth Gateway to satellite communication in the U.S.A under strict terms, and that has obtained or is in the process of obtaining, permission to operate such links in the E-Band in a number of other countries, including Germany , Spain and the United Kingdom. According to our knowledge, no issues have been made publicly available so far from the use of E-Band for Earth Gateway to LEO satellite cluster communication under the terms and technical restrictions and at the specific locations that the various national regulators have allowed the use of the Earth Gateway to Space E-Band links.

Nevertheless, harmful interference between other types of established E-Band-based services and Earth Gateway to satellite communication services in that band cannot be precluded in all possible cases that currently exist or may arise in the future in the field. Apart from fixed service, other types of services may also be impacted, including Earth Exploration Satellite Services (EESS) in the 86-92GHz band as well as airplane navigation systems. Today, there exist commercial E-Band power amplifiers used for satellite communication that can emit 10's of Watts of radiated power at the antenna port, much more than used for terrestrial services.

There is justified concern by a wide range of parties in the wireless communications and astronomy areas that interference from Earth Gateway to Satellite links has the potential to affect existing services in the E-Band. The issue of co-existence of the current fixed and mobile services in the E-Band as well as EESS and radio astronomy services with the fixed-satellite (FSS), mobile-satellite (MSS) and broadcasting-satellite services (BSS) is under study and it is to be reviewed at the World Radio Communication Conference in 2027 (WRC-2027) as per Agenda Items 1.10 and 1.18 for WRC-27 (RESOLUTION 813 (WRC-23)). Technical terms for the safe co-existence of all these services are still to be determined and become globally accepted regulation, percolating downwards to multi-national and national regulatory body regulations in due course.

Given the publicly available international experience, INTRACOM TELECOM is supportive of the use of the E-Band for Earth Gateways to satellite links with due caution. This frequency band is used in Greece as a wireless transport technology for urban, suburban, and semi-rural 4G and 5G network coverage expansion, wherever suitable optical fiber connectivity is not available. Long range E-band terrestrial transport links are achievable with modern technology, thus the use of the E-Band for terrestrial fixed service/backhaul is not restricted only within or near urban areas, which may be located away from Earth Gateways. Consequently, using the E-band for establishing Earth Gateway to satellite links in non-urban areas does not preclude the possibility of harm to terrestrial services in such areas.

In conclusion, INTRACOM TELECOM is proposing that until the time that co-existence/co-ordination conditions and related regulations have been clarified and adopted by the Wireless community, permission to use E-Band spectrum for Earth Gateways to satellite communication should be awarded, taking into account the experience and practices of other national regulators, on a temporary, per case basis, after the detailing of sufficiently comprehensive interference studies. The studies should consider and demonstrate the ability of the E-Band satellite links to accommodate and coexist with other present and future terrestrial and satellite systems in particular locations and under specific operational parameters.



Other stakeholders, including communication services providers and scientific organizations, using or planning to use the E-Band or adjacent bands, whose operations may be affected by usage of the E-Band spectrum in between Earth Gateways and Satellites, should be consulted before the activation of the Earth Gateway to satellite E-Band links. The licenses should be subject to review based on proof of interference to existing services and the outcomes of the international regulatory efforts.

Best regards,

Kartlos Edilashvili
Acting Managing Director
(Acting CEO)