

20 July 2018

CNECT-RSPG@ec.europa.eu

Radio Spectrum Policy Group
Directorate-General for Communications Networks, Content and Technology
European Commission

RE: Comments on (Draft) RSPG Opinion on the ITU-R
World Radiocommunication Conference 2019

Dear Sir or Madam:

EchoStar Mobile Limited (“EML”) and Hughes Network Systems Europe (“Hughes Europe”) (collectively, “EchoStar”) hereby provide comments in response to the (Draft) RSPG Opinion on the 2019 ITU-R World Radiocommunication Conference (“WRC-19”).

EML has been authorised to establish and operate a mobile satellite service (“MSS”) with a complementary ground component (“CGC”) in the 2 GHz band on a European Union-wide basis.¹ In June 2017, the EchoStar XXI satellite was successfully launched, and in December 2017, EML’s pan-European 2 GHz MSS service entered into commercial service. With a completed MSS ground infrastructure, and the distribution of its first portable data terminal for use with EchoStar XXI, EML’s MSS service is providing a host of new connectivity options for the 5G community, including all the benefits of satellite connectivity: ubiquity, resiliency, reliability, and redundancy. EML has already received authorization from eight Member States to build out the CGC complement of the 2 GHz network.² Furthermore, EML has announced a partnership with Thales to provide public protection and disaster response service (“PPDR”) throughout France and, in the future, the rest of Europe.³

Hughes Europe provides high-quality, resilient, and cost-effective broadband network solutions to organisations throughout Europe. Combining the best of breed in satellite and terrestrial technologies and supporting world-class Managed Network Services, Hughes Europe provides a range of communications solutions to retailers across Europe. Hughes Europe is a wholly owned

¹ See Commission Decision of 13 May 2009 on the selection of operators of pan-European systems providing mobile satellite services (MSS), 2009/449/EC.

² EML has CGC authorizations in: Cyprus, Germany, Greece, Italy, Latvia, Portugal, Spain, and Sweden. EML has also applied to the United Kingdom for authority, and the application is still pending.

³ See Press Release: EchoStar Mobile and Thales Partner on Mobile Satellite Connectivity for Public Protection and Disaster Relief (22 June 2017). Available at: <http://echostarmobile.com/Newsroom/EchoStar%20Mobile%20and%20Thales%20Partner%20on%20Mobile%20Satellite%20Connectivity%20for%20Public%20Protection.aspx>.

subsidiary of Hughes Network Systems, LLC, the largest provider of satellite-based broadband connectivity globally.

With respect to the WRC-19 Agenda Items listed below, EchoStar urges the RSPG to make recommendations as follows:

- **WRC-19 Agenda Item 1.5:** EchoStar supports the RSPG recommendation as it will ensure that there is available spectrum for earth stations in motion (“ESIMs”) while ensuring adequate protection for other fixed satellite service (“FSS”) applications from ESIMs operations.
- **WRC-19 Agenda Item 1.6:** EchoStar generally supports the proposed recommendation. On the issue of NGSO-GSO sharing, we support the development of a regulatory scheme that provides full protection to geostationary orbit (“GSO”) FSS. On the issue of protection for earth exploration service by satellite (“EESS”), we support the ongoing studies with respect to non-geostationary orbit (“NGSO”) systems, the scope of this agenda item does not permit more stringent restrictions to GSO networks beyond the existing out of band emission (“OOBE”) standard, as satellite companies have begun development and construction of new systems in reliance on the existing standard. Any modification to the OOBE standard must not be applied retroactively to systems for which full coordination data is received before the effective date of the Final Acts of WRC-19.
- **WRC-19 Agenda Item 1.7:** EchoStar supports the RSPG recommendation. This approach appropriately balances new and existing uses of the spectrum and orbital resource.
- **WRC-19 Agenda Item 1.13:** EchoStar has concerns about a global allocation of the 40.5-43.5 GHz band for IMT. In Region 2 the 40.42 GHz band is identified for high density applications in the fixed-satellite service (“HDFSS”). Accordingly, it is critical that in Region 2, this band remain available for this purpose, as feasibility sharing between ubiquitous IMT and HDFSS user terminals has not been demonstrated. EchoStar supports the proposal of a recommendation opposing any consideration of the 27.5-29.5 GHz band for IMT.
- **WRC-19 Agenda Item 1.14:** EchoStar supports the RSPG recommendation on HAPS.

Additionally, EchoStar asks that the RSPG add to its recommendations a no change position in response to **Agenda Item 9.1, issue 9.1.1**, which is not presently addressed in its draft opinion. A no change outcome will permit maximum flexibility for EML and other MSS operators to ensure compatibility between the terrestrial and satellite components of IMT and deploy broadband services as dictated by constantly changing demands and technology.

If you have any questions or concerns, please contact the undersigned.

With my warmest regards,

Jennifer A. Manner
Head, Regulatory Affairs