SES S.A. ("SES") appreciates the opportunity to provide comments to the Radio Spectrum Policy Group (RSPG) regarding the "Public Consultation on the Draft RSPG Opinion on Spectrum Aspects of Intelligent Transport Systems." SES (www.ses.com) is a leading global satellite operator headquartered in Luxembourg. SES offers connectivity to 99% of the world's population via its fleet of over 50 geostationary satellites operating in the C-, Ku- and Ka-band frequencies.

With respect to the recommendations on Intelligent Transport Systems (ITS) for roads, SES notes the concern regarding potential impact on robust and safe operations within the 5 875 – 5 905 MHz band designated for safety-related ITS due to potentially competing technologies. This also highlights the lack of experience on safety-related ITS operations in the said band. SES also notes the point regarding lack of, despite being designated for, ITS operations in the 2 x 20 MHz above and below the 5875-5905 MHz band.

SES believes that the intention to expand to share spectrum in the 2 x 20 MHz above and below the 5 875 – 5 905 MHz band for safety-related Intelligent Transport Systems (ITS) would contradict the spirit of efficient use of scarce spectrum resources and more importantly would be premature due to lack of evidence on the need for expansion of spectrum for safety-related ITS operations. The reliability of ITS operations, especially crucial for safety-related ITS, without claiming protection from FSS has not been established. SES therefore strongly recommends RSPG that detailed compatibility studies outside the scope of ECC Report 101 be carried out to ensure that such reliable operation could be achieved.

In addition, the successful deployment of ITS devices all over Europe would create a new scenario of aggregate interference from millions of cars equipped with On-Board Units (OBU) and Road Side Units (RSU) whose impact into satellite receiving beams has to be also assessed.