

From: [Martin von der Ohe](#)
To: [CNECT RSPG](#)
Cc: regulatory@lacuna.space
Subject: Public Consultation response
Date: jeudi 21 décembre 2023 15:36:35

Dear Sir or Madam,

Lacuna Space would like to thank RSPG to offer the opportunity to respond to the Draft RSPG Opinion document, dated October 25th 2023.

We would like to comment as follows:

- We support the view that a technology neutral approach should be followed.
- We agree that a near-term decision, i.e. in 2025, would be reasonable for planning.
- We agree that a band segmentation might be needed to protect solutions that allow efficient spectrum sharing from those which do not have this capability.
- We agree that the “continuity scenario” may limit competition in MSS service provision and that it is not a preferred scenario. If continuity shall be ensured in a new scenario, it could be considered to open the sub-band(s) for compatible technology (e.g. LoRaWAN where currently used).
- We note that there is a focus on 3GPP solutions, which is not in line with the technology neutral approach.
- We note that there is currently no scenario proposed that allows sharing between multiple operators, while such a scenario would be feasible for some operators.
- We want to highlight that while a bandwidth of 5 MHz would be desired for a LoRa deployment, even a smaller band segment would be feasible. This would allow a scenario where besides a LoRa segment, other segments could be fitted in a 5 MHz band.

With best regards
Martin von der Ohe

Martin von der Ohe
Director, Regulatory Affairs
Lacuna Space
Mail: martin.vonderohe@lacuna-space.com