



Fountain Court, 2 Victoria Square,
Victoria Street,
St. Albans,
Hertfordshire, AL1 3TF
UNITED KINGDOM

VIA Web Submission through the ACMA Website

11 August 2017

**Australian Communications and Media Authority (ACMA)
5/65 Pirrama Road
Sydney NSW 2009
AUSTRALIA**

RE: Comments on ACMA on the Future Approach to the 3.6 GHZ Band Options Paper (IFC: 9/2017)

The Global VSAT Forum (“GVF”) is pleased to express our views on ACMA’s consultation on the Future Approach to the 3.6 GHZ band options paper (IFC:9/2017).

GVF is the global voice of the international VSAT and satellite community. It is composed of members from every major region of the world and from every sector of the satellite industry, including satellite operators, manufacturers, system integrators and satellite service providers. GVF works with regulators around the world to design and promote regulatory structures that permit effective satellite services. A complete list of GVF members is available at:

<http://www.gvf.org/about-gvf/membersdirectory.html>

GVF membership includes all global satellite companies delivering essential communications services to modern societies using C Band radio frequencies in the 3.4-4.2 GHz band. These companies regularly attend the annual events: the Australiasia Satellite Forum 2017 held in May in Sydney, CommunicAsia held in May in Singapore, the Satellite Workshop at the Policy & Regulatory Forum for the Pacific 10 in April this year in Fiji, and the ITU Satellite Symposium held in August this year in Bangkok, to discuss the continued role and development of the sector in Asia-Pacific and other regions of the world.



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GVF fully endorses the views expressed by the Communications Alliance LTD Satellite Services Working Group (“SSWG”) that:

- If the band 3.6- GHz band is to be made available for mobile broadband systems, then mobile broadband should be required to co-exist with FSS operations. A sharing / coexistence strategy within existing areas is suggest be more appropriate, orthodox and lower risk strategy.
- The FSS industry is well placed to work in close harmony in delivering MBB by complementary measures, and can work with MBB operators for them to take immediate advantage of spectrum licensing and their implementation of services without delays caused by re-allocation.
- The preferred options, in order are: a further qualified Option 1 or 4b, then a 3c/4b combination.

GVF remains at ACMA’s disposal for any further consultation or discussion related to the practical aspects of ensuring the coexistence between FSS and IMT in this frequency band. The GVF agrees to its comments being available for public viewing on ACMA’s website.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Hartshorn', with a long horizontal flourish extending to the right.

David Hartshorn
Secretary General
Global VSAT Forum
David.Hartshorn@gvf.org