



The Manager
Wireless Broadband Section
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

16 December 2022

Dear Sir/Madam,

RE: Review of 2 GHz spectrum licensing technical framework - consultation 38/2022

EchoStar Global Australia is an Australian mobile satellite service (MSS) low earth orbit satellite operator in the 1980-2010 MHz and 2170-2200 MHz band (2 GHz band).

EchoStar Global Australia is today operating the SIRION-1 network and plans to seek approval to provide 2 GHz band MSS, once ACMA's rules are finalised. Accordingly, EchoStar Global Australia supports ACMA considering appropriate technical rules to protect operations in the 2 GHz band and adjacent bands.

Below are EchoStar Global Australia's comments on the matters listed for feedback in the Review of 2 GHz spectrum licensing technical framework - consultation 38/2022 paper.

1. The ACMA is seeking comment on the two options proposed for unwanted emissions in the frequency range 2100–2110 MHz.

No comment.

2. Comment is sought on the effect the proposed changes to the 2 GHz technical framework may have on incumbent services in the 2 GHz band and adjacent bands.

The proposed changes are acceptable. The proposed unwanted emissions into 2170-2180 MHz will adequately reduce the probability of harmful interference into MSS operations.

3. Comment is sought on the changes proposed to the:
 - a. 2 GHz band spectrum licenses conditions.

The proposed changes are acceptable. EchoStar Global Australia support the use of the 3GPP standards that were used to derive the proposed limits for 2170-2180 MHz band.

- b. Draft Radiocommunications (Unacceptable Levels of Interference – 2 GHz Band) Determination 2016 (s.145(4) determination 2023).

The proposed changes are acceptable. The modifications in Schedule 2 and 3 maintains the adequate level of protection against adjacent MSS operations.

4. The Radio Advisory Guidelines for this band will sunset in 2026. We have formed the view that the instrument is operating efficiently and effectively, and we propose to remake the instrument. This will ensure the instruments remain valid for the remainder of the spectrum license period. Comment is sought on remaking of the instruments:

- a. Draft Radiocommunications Advisory Guidelines (Managing Interference from Spectrum Licensed Transmitters – 2 GHz Band) 2023

The proposed changes are acceptable. The updated Part 4- MSS provides the necessary information that radiocommunications transmitter operating under a 2GHz spectrum license will not interfere with MSS receivers if they comply with the conditions of their license.

- b. Draft Radiocommunications Advisory Guidelines (Managing Interference to Spectrum Licensed Receivers – 2 GHz Band) 2023.

The proposed changes are acceptable. The proposed changes provide much needed clarity to the rules and guidelines for licensed receivers.

We thank the ACMA for the opportunity to provide comments on the matters raised in this consultation.

Respectfully submitted,

Jennifer A. Manner
Head, Regulatory Affairs
Jennifer.manner@echostar.com

Jaime Londono
Head, Engineering Satellite Services
Jaime.londono@echostar.com