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RATEL

Regulatory Agency for Electronic Communications and Postal Services

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RE: Public Consultation on the Draft Rulebook on the Use of Radio Frequencies under the General Authorization Regime

Greetings Ms. Vučić:

Inmarsat hereby respectfully responds to RATEL's recently published "Draft Rulebook on the Use of Radio Frequencies under the General Authorization (GA) Regime." Inmarsat appreciates RATEL's request for input on the updated Rulebook, and we welcome the opportunity to contribute.

In reviewing the document, Inmarsat specifically noted Section 1.15 – which details permitted license-exempt frequency use for satellite communications. We understand frequencies used in this Section are exempt from individual licensing requirements, with operation subject only to registration and GA conditions. This is a very helpful guide for Inmarsat and will certainly be useful as we plan for future deployment.

Inmarsat would express one point of concern with RATEL's draft guidance in Section 1.15, namely that the administration has selected not to exempt L-band operations within its updated GA regime. Section 1.15 does not include any reference to L-band frequencies (e.g. 1626.5-1660.5 MHz [uplink], 1670-1675 MHz [uplink] and 1518-1559 MHz [downlink]), nor does it make mention of plans to do so in the future. We understand, from separate communications, that RATEL in fact explicitly requires individual licensing for MSS terminals in L-band and extended L-band.

As you may be aware, L-band is critically important to Inmarsat's ongoing and future operations, and we continue to rely on efficient access to these frequencies for provision of our many key networks and services. Inmarsat's land based MSS terminals provide essential support to several vital industries, from energy and transportation to critical emergency services throughout Europe. Please also note that L band frequencies are used by Inmarsat to provide ICAO and IMO-mandate international safety services for the aeronautical and maritime users worldwide, including those operating in Serbian territory.

As you may also know, MSS terminal operations in L-band and extended L-band are currently covered under ECC Decision 12(01), and have been since 2012. Decision 12(01) outlines an extensive range of technical conditions and parameters under which these frequencies are permitted without additional licensing – all of which prioritise free circulation of land-based terminals in L-band.

Whilst we understand RATEL's need to maintain its own unique licensing regime, we would note that ECC 12(01) has been widely adopted by administrations across Europe. RATEL remains one of the few European regulators not currently following ECC 12(01).

As outlined in the Decision, individual licensing is not always the best mechanism for managing access to certain bands and types of radio equipment. Land-based terminals, for example, function in a unique manner that makes them highly unlikely to interfere with operations from other bands and services. We would note Inmarsat also remains fully compliant with all applicable ETSI standards currently in place for MSS equipment. We are confident that our continued compliance with these standards, along with the noted technical characteristics, make land-based MSS terminals inherently less likely to require significant individual oversight or attention from regulators.

Given the above technical notes, the widespread applicability of ECC Dec 12(01), and the broader need for efficient access to L-band, we believe it makes sense to include L-band among those frequencies not requiring specific licensing under your new Rulebook. Lengthy administrative licensing processes can substantially delay key rollout milestones and ultimately stall provision of important services. A more general licensing approach would therefore bring the benefit of minimizing RATEL's administrative work associated with the use of MSS terminals.

We thus recommend RATEL join the numerous other administrations already implementing ECC DEC 12(01), and ask you to support license-exempt use of L-band. For purposes of the Rulebook, we would respectfully request RATEL formally include the aforementioned L-band frequencies in Section 1.15 and as part of your General Authorization plans going forward.

We are happy to answer any further questions on the points raised above. As noted, Inmarsat fully supports this consultation process and we appreciate the opportunity to contribute.