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**VIA Email**

**7 September**

Hong Kong Office of the Communications Authority (OFCA)  
29/F Wu Chung House  
213 Queen's Road East  
Wan Chai  
Hong Kong

**RE: Comments to the OFCA Consultation on Proposed Change in the Allocation of the 3.4 – 3.7 GHz Band from Fixed Satellite Service to Mobile Service**

The EMEA Satellite Operators Association (ESOA) represents the interests of satellite operators who deliver information communication services across the globe. ESOA membership includes satellite operators active in all regions of the world including the APAC region.

ESOA is very concerned about the change in allocation of the 3.4-3.7 GHz band from FSS to Mobile proposed by the Hong Kong Office of Communications Authority (OCA). As such, ESOA fully endorses the views expressed by the Cable & Satellite Broadcasting Association of Asia ("CASBAA") that:

- There is a need for a more concerted approach with all concerned parties as services to businesses and consumers in the region may be lost altogether or significantly degraded if the FSS spectrum is re-allocated according to the OCA's proposal.
- It is essential to protect existing and future SMATV/EFTNS/SPETS systems operating in the adjacent band of 3.7-4.2 GHz with appropriate mitigation measures. In addition, TT&C and TVRO systems need protection, and this should be made at the expense of public mobile services licensee late comer(s).
- Effecting the proposed re-allocation in early 2020 is too short a notice period. This will set a dangerous precedent for spectrum assignment and regulation in the region in terms of ensuring business certainty over a minimum reasonable period, and regardless of the current utilisation of a given spectrum compared to other available spectrum.

ESOA remains at OFCA's disposal for any further consultations or discussions related to the practical aspects of ensuring the coexistence between FSS and IMT in this frequency band. ESOA agrees to its comments being available for public viewing on OFCA's website.

Sincerely,



**Aarti Holla**  
Secretary General