



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

**VIA Email**

**7 September 2017**

**Hong Kong Office of the Communications Authority (OFCA)  
29/F Wu Chung House  
213 Queen's Road East  
Wan Chai  
Hong Kong  
Attn: Senior Telecommunications Engineer (Spectrum Planning) 1**

**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 Global VSAT Forum (“GVF”) is pleased to express our views on OFCA’s consultation on the proposed change in the allocation of the 3.4-3.7 GHz Band from Fixed Satellite Services to Mobile Services.

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.

GVF fully endorses the views expressed by the Cable & Satellite Broadcasting Association of Asia (“CASBAA”) that:

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- The view on the Proposed Re-Allocation is strongly opposed as recommendations for less haste and more warning of all concerned parties as services may be lost altogether or significantly degraded if the FSS spectrum is re-allocated according to the CA's proposal.
- The principle of protecting existing SMATV/EFTNS/SPETS systems operating in the adjacent band of 3.7-4.2 GHz with the implementation of mitigation measures and proposes extending the protection to future systems. In addition to SMATV/EFTNS/SPETS systems, TT&C and TVRO systems need protection at the expense of public mobile services licensee late comer(s).
- The view on effecting the Proposed Re-Allocation in early 2020, giving an advance notice period of two year if the relevant decision of the CA is made in early 2018 is strongly opposed, given that this notice period is shorter than the TA Statement. Normally, a shortened notice period is applicable if a licensee is failing to meet some license requirements, for example to roll out or to continue adequately to provide a licensed service. This is clearly not the case here. The satellite operators, their service provider and content provider customers and end-users of the services have done nothing wrong, yet will be penalised by such action. This will set a dangerous precedent for spectrum assignment and regulation in Hong Kong, signaling that any spectrum may be "up for grabs" at any time at the regulator's whim, regardless of its current utilisation compared to other available spectrum.
- Protection is essential for the TT&C channels of the licensed satellite networks at their specific locations from any harmful interference to be caused by public mobile services.

GVF remains at OFCA'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 OFCA's website.

Sincerely,



**David Hartshorn**  
Secretary General  
Global VSAT Forum  
[David.Hartshorn@gvf.org](mailto:David.Hartshorn@gvf.org)