



## COMMENTS ON STATEMENT OF STRATEGIC PRIORITIES FOR TELECOMMUNICATIONS, THE MANAGEMENT OF RADIO SPECTRUM AND POSTAL SERVICES

MARCH 2019

EchoStar Mobile Limited (EML), and Hughes Network Systems Europe (Hughes Europe) (collectively, EchoStar)<sup>1</sup> provide their comments to the Statement of Strategic Priorities for telecommunications, the management of radio spectrum and postal services of the DCMS.<sup>2</sup> EML currently offers voice and narrowband MSS service over the recently launched, state-of-the-art EchoStar XXII satellite<sup>3</sup> throughout the European Union, including in the UK.<sup>4</sup> Hughes Europe provides high-quality, resilient, and cost-effective broadband network solutions to organisations throughout Europe. Combining the best of breed in satellite and terrestrial technologies and supporting world-class Managed Network Services, Hughes Europe is a wholly owned subsidiary of Hughes Network Systems, LLC, the largest provider of satellite-based broadband connectivity globally.

EchoStar supports the United Kingdom's commitment to make the UK a world leader in 5G. As noticed on numerous occasions 5G should not be considered simply as the next step in the evolution of mobile broadband. 5G will become a vital element of the future digital world. 5G architectures will be supported by the next generation of ubiquitous ultra-broadband infrastructure, which is expected to necessarily depend on multiple technological platforms, including wired, wireless and satellite. Satellites are already delivering the next generation communication services: new High Throughput Satellites (HTS) – like Hughes Network Systems EchoStar XIX (JUPITER 2) – enable new broadband services for customers at speeds of 25/3 Mbps and more throughout the Americas. Future satellites and systems, including Hughes Network Systems' JUPITER 3 (high density satellite<sup>5</sup>), One Web<sup>6</sup>, and others, will enhance and expand the satellite broadband experience. 5G encompasses all technologies available to create a capillary European digital market. EchoStar is currently looking at the provision of innovative offer in the machine-to-machine and IoT satellite services that it may be interesting to the new UK Strategic plan to fill the white spots in its coverage for those services.

EchoStar welcomes the UK Government's strategic priority to continue the implementation of the European Electronic Communication Code as it will allow a continuity of the regulatory

<sup>1</sup> See Commission Decision of 13 May 2009 on the selection of operators of pan-European systems providing mobile satellite services (MSS), 2009/449/

<sup>2</sup> Please add cite.

<sup>3</sup> Press Release: EchoStar XXI Satellite Successfully Launched (8 June 2017). Available at: <https://www.echostar.com/Press/Newsandmedia/EchoStar%20XXI%20Satellite%20Successfully%20Launched.aspx>.

<sup>4</sup> See EchoStar Mobile Limited, Licența de Utilizare a frecvențelor Radio, MS-PCS 01/2015 (06 May 2015).

<sup>5</sup> <https://spacenews.com/echostar-buys-jupiter-3-ultra-high-density-satellite-from-ssl/>

<sup>6</sup> Hughes Networks is an investor in OneWeb [https://group.softbank/en/corp/news/press/sb/2016/20161219\\_01/](https://group.softbank/en/corp/news/press/sb/2016/20161219_01/)



framework and provide certainty to the stakeholders that are of crucial importance in the time of Brexit.

EchoStar is also encouraged that the UK Government will continue to be actively involved in the CEPT and ITU to ensure its close coordination with the EU on the spectrum harmonisation questions. EchoStar will continue to work to develop UK and European regional positions for WRC-19, and is committed to developing positions that allows access to sufficient spectrum for all communication service providers, in order to meet the needs of expanding and diffuse needs in this new 5G ecosystem. This includes ensuring the protection of existing services (including satellite services) as frequency bands are being made available for new uses (including terrestrial IMT and high altitude platform stations) and ensuring access to needed additional spectrum for satellite.

EchoStar also supports the Government's invitation to Ofcom to clarify through amendments the spectrum trading guidance notes. In particular more clarity is welcome with regard to the conditions to transfer or lease spectrum assigned to the ground complementary component to the mobile satellite service in the light of the UK exit from the EU MSS decision and the implementation of the new national framework.

EchoStar is looks forward to bringing its expertise and capabilities to contribute to the UK successful implementation of its strategic goals.

Jennifer A. Manner

Head of Regulatory Affairs, EchoStar Mobile Limited

Senior Vice President, Hughes Network Systems Europe

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Yulia Kulikova

Senior Director of Regulatory Affairs

EchoStar Mobile

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