



# Frequency Migration Regulation ICASA Hearings

The risks of proposed migration plan  
on the satellite bands



European Satellite Operators Association

# ESOA's Satellite Operators



Not for profit organisation  
11 satellite operators  
161 satellites

Members provide FSS, BSS and MSS service across Europe and Africa  
Serve South Africa, SADC, surrounding oceans and airspace

# Indispensable services put at risk

- Heavy use of satellite bands in South Africa / SADC
- Government and strategic communications
- Complementary services for mobile networks
- Point-to-point trunking
- High-volume data and broadcast transmission
- Emergency and disaster communications
- Rural and remote telephony
- Aeronautical and maritime services
- TV transmission to receive-only earth stations
- Communications for key industry (mining, exploration)

## How Much Connectivity is at Risk?

The current numbers...

- 41 satellites operating C band over SADC
- 6 new satellites will carry it soon
- Total coverage of SADC region
- Growth of supply answers region's call

## Context

- Familiar debate for international community connected to satcoms
- Use of C band widely discussed, conclusions remain same
- Technical arm of United Nations addressed it:
  - International Telecommunication Union (ITU) provides international regulatory framework for frequency use
  - ITU's supreme body (WRC) has spoken
- In 2007, ITU recognised the necessity to retain C-band in full for satellite services

## Reasons for ITU Position

- Majority of Member States sensitive towards consequences to users
- High risk of interference to FSS earth stations
- Proven demand for more FSS at C band
- *Unproven* need for C band by other services
- Links between C band connectivity and economic development
- Indispensability of satellite use of 3.4-4.2GHz

## Risks to Rejecting ITU

- WRC-07 deliberations demonstrate risks to allowing fixed services in 3.4-4.2GHz (unacceptable interference levels)
- WGET, other UN agencies concurred
- ITU reconfirms challenges to FSS/BWA compatibility again and again
  - ITU-R Reports S.2199, M.2109, S1432, and SF.1006
- Also: South Africa should consider regional/global impact of de-harmonising spectrum

## What Problem Are We Solving?

- South Africa has already taken for IMT/BFWA, the lower 200 MHz of C-band (3400-3600 MHz), which are globally allocated to fixed-satellite services
- Current deployment in and usage of existing frequency bands (including the 3400-3600 MHz) by terrestrial wireless services should be studied before looking for additional frequency bands for IMT/BFWA
- With unproven demand & lack of experience, it is premature to decide for change



## New Technologies Can Use Other Bands – Satellites Cannot

- Migration is not an option: Ku band is *not* C band
- C band enables operations in worst climatic conditions
  - Ku- and Ka-band more subject to rain fade
- Provides unparalleled reliability
- C band enables global beams connecting whole of Africa
- Allows for lower-cost of services to the region
- Connects with robust terrestrial infrastructure
- Least-developed and equatorial regions have no alternative

## Should Not Jeopardise Infrastructure that Works

- Billions invested in space infrastructure
- C-band missions dedicated to the needs of SA and region
- No other radio service takes local requirements so seriously
  - With such significant investment
  - With such high up-front costs
  - Maximising efficient use of frequencies

## L, extended L and S Bands Remain Key

- Mobile satellite use on the rise in Africa
- Planned and ongoing build in L and extended L band satellites – risk to important upfront investment
- Use of L band by fixed service will cause interference that into key MSS services – in *SA and* neighbours
- No interference mitigation possible
- Proposals for S band mean planned services in Europe won't come to *SA* or neighbours
- Preserving key MSS services means transitioning FS systems *out* of these bands

# Conclusions

- International best practice says: keep C band, L-band, extended L-band and S-band for satellite
- International community has spoken: keep C band for satellite
- Technical studies make clear: C band best for reliable FSS services
- Shared use with FS not feasible in MSS bands
- Terrestrial wireless services should first start using assigned frequency bands before pursuing bands extensively used by existing services
- Should not cut off the connectivity that keeps national and regional economy in growth