



24 Feb 2022

The Manager
Space Systems
Australian Communications and Media Authority
PO Box 78

Belconnen ACT 2616

Dear Madam/Sir,

Support for Telesat Canada to be Included in Schedule 1 of the Radiocommunications (Foreign Space Objects) Determination 2014

Telesat thanks the Australian Communications and Media Authority (“ACMA”) for consideration of inclusion as one of the entities under the Radiocommunications (Foreign Space Objects) Determination 2014 (“FSOD”) and the opportunity to provide further comments relating to this consultation.

Telesat T18V¹ geostationary satellite currently provides coverage in the Asia Pacific region, including Australia. The footprint of this satellite extends to Hawaii and is an attractive option for users who wish to provide connectivity in this region back to the Americas. The present mode of individual licensing of these User Terminals may not be sustainable with the expected increase in the number of users on the T18V.

Furthermore, the upcoming Telesat Lightspeed low Earth orbit satellite system will have global coverage and is intended to revolutionise the users’ experience for broadband connectivity. Australia is considered a top priority country for service provision.

In view of the lower latency and higher throughput achievable by novel state-of-art Telesat Lightspeed system, Telesat expects an increase in demand from consumers, enterprise and governmental users due to the larger variety of applications being supported. These include mobile backhaul or fixed wireless access to rural or inaccessible areas, enterprise connectivity requiring real-time synchronisation of information across geographically separated site offices, time-critical disaster relief operations as well as high capacity ubiquitous connectivity for users on board aircraft and vessels traversing Australian airspace and waters.

¹ <https://www.telesat.com/wp-content/uploads/2021/09/Telstar-18-VANTAGE.pdf>

As such, Telesat expects a higher number of ubiquitous terminals to be deployed across Australia in the coming years. To provide flexibility and facilitate the licensing process of user terminals communicating with Telesat's T18V and Telesat Lightspeed satellites, Telesat would like to kindly reiterate the support for inclusion of "Telesat Canada" in the FSOD, allowing the collective class licensing of such user terminals. This will also enable the provision of Telesat's satellite services on an equal basis with other operators that are already in the FSOD.

Should there be any clarifications required on any of the comments within this letter, please feel free to contact the undersigned.

Thank you.

A handwritten signature in black ink, appearing to read "Zhi Guo", is centered on a light gray rectangular background.

Lim Zhi Guo
Market Access & Spectrum Policy, APAC
zlim@telesat.com