9 March 2022

Mark Arkell
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Communications Infrastructure Division
Australian Communications and Media Authority
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Dear Mark

RE: Update to Foreign Space Objects Determination consultation

The Communications Alliance Satellite Services Working Group (SSWG) welcomes the opportunity to comment on the ACMA's *Update to Foreign Space Objects Determination* consultation.

The SSWG supports proposed amendments to Schedule 1 of the Foreign Space Objects Determination to include the following SSWG members as owners, controllers or operators of foreign space objects:

> Kuiper Systems LLC (incorporated in the United States of America)
> Omnispace LLC (incorporated in the United States of America)
> Telesat Canada (incorporated in Canada)

The inclusion of these networks/systems will provide Australian service providers and users additional options on the satellite capacity available domestically and globally, each with its own unique innovative offering.

Kuiper Systems LLC's low Earth orbit (LEO) non-geostationary satellite orbit (NGSO) constellation will provide ubiquitous, high-capacity, high-speed, low latency broadband services to unserved and underserved communities around the world, including in Australia. These networks will enable service to Australians living in rural and regional areas, industries (such as mining and agriculture), and emergency and disaster relief efforts. In addition to delivering broadband services to all Australians regardless of where they may live, the Kuiper Systems LLC LEO NGSO constellation will enable services to aircraft, ships at sea and to land based vehicles.

The addition of Omnispace on the Australian Foreign Space Objects Determination List will benefit Australia as Omnispace's current operational Medium Earth Orbit (MEO) NGSO satellite system in the 2 GHz S-band (1980 – 2025 MHz Earth-to-space / 2170 – 2200 MHz space-to-Earth) is already providing mobile satellite service on an experimental basis in Victoria, Australia, and is ready to provide service throughout Australia.   Omnispace is investing in new technology and infrastructure as part of its next generation global constellation designed to provide hybrid 5G connectivity. The Omnispace network will power critical global communications, including 5G NTN (5G Non-Terrestrial Network) and Internet of Things (IoT) connectivity, directly from its satellites in space to mobile devices around the world. Omnispace is building upon the investments it has already made to validate 3GPP standards-

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based 5G products and technologies and to demonstrate 5G connectivity from space. Omnispace's hybrid MSS system can provide a broad range of services of interest to Australia, including a wide array of possible commercial and government communications in the areas of agriculture, mining, fishing, emergency response, public safety, and logistics in rural and isolated areas lacking in coverage.

Apart from the existing T18V satellite footprint in the Asia Pacific region, Telesat has plans to also provide satellite capacity in Australia via a highly advanced revolutionary LEO satellite constellation capable of delivering ubiquitous, affordable, high-capacity links with fibre-like speeds and low latency. Telesat Lightspeed is designed to maximise system efficiency through flexibility in terms of coverage (by means of steerable beams and inter-satellite links) as well as bandwidth and power assignment (by means of onboard processing). These features support demand where they are required and enhance the connectivity experience of users.

If you have any questions with respect to this submission, please contact Mike Johns at Communications Alliance on 0414 898 841.

Yours sincerely,

John Stanton
Chief Executive Officer

About Communications Alliance
Communications Alliance is the primary telecommunications industry body in Australia. Its membership is drawn from a wide cross-section of the communications industry, including carriers, carriage and internet service providers, content providers, equipment vendors, IT companies, consultants and business groups. Its vision is to provide a unified voice for the telecommunications industry and to lead it into the next generation of converging networks, technologies and services. The prime mission of Communications Alliance is to promote the growth of the Australian communications industry and the protection of consumer interests by fostering the highest standards of business ethics and behaviour through industry self-governance.

For more details about Communications Alliance, see:
http://www.commsalliance.com.au/

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