

To: The Manager
Space Systems Section
Australian Communications and Media Authority
PO Box 78
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February 28th, 2022

**Replanning the 2 GHz band: Review of the 2 GHz Television Outside Broadcast Frequency
Band Plan Consultation**

Comments of Kepler Communications

Kepler Communications Inc. (“Kepler”) hereby submits the following comments in response to the consultation issued by the Australian Communication Media Authority (the “ACMA”) regarding the re-planning of the 2 GHz band to ensure optimal use.¹ Kepler is grateful for the opportunity to show support for the proposals set forth in this consultation, especially in light of the extensive consultation process conducted by the ACMA to establish its 2GHz an implementation plan.²

The ACMA has provided draft legislation detailing the proposed plan to make certain parts of the 2 GHz band available for various Mobile Satellite Service (“MSS”) uses.³ This replanning will maximize the public benefit derived from the provision of satellite services in the band,

¹ ACMA, *Replanning the 2 GHz band: Review of the 2 GHz Television Outside Broadcast Frequency Band Plan*, Consultation Paper (Dec 2021- Updated Feb 2022) (“Consultation Paper”).

² The ACMA released an Options Paper providing three potential planning options for consideration and a subsequent Outcomes Paper on the same subject of re-allocating the 2 GHz band. See ACMA, *Replanning the 2 GHz Band – Options Paper* (July 2020); ACMA, *Replanning the 2 GHz band – Outcomes Paper* (January 2021) (“Outcomes Paper”).

³ The Radiocommunications (Mobile-Satellite Service) (1980-2010 MHz and 2170-2200 MHz) Frequency Band Plan 2022 (“the 2 GHz MSS band plan”); The Radiocommunications (Television Outside Broadcasting) (2010–2110 MHz and 2200–2300 MHz) Frequency Band Plan 2022 (“the TOB band plan”).

particularly as this will align this band with the international community by dedicating a substantial proportion of its use to MSS; the ACMA identified its desire to “support new uses of the band consistent with international harmonization and domestic considerations”, particularly noting the importance of enabling the development of MSS and the Internet of Things (“IoT”) applications.”⁴

Within this plan, the ACMA provides the crucial certainty necessary for future licensees to carry out operations in Australia by establishing clear timeframes by which MSS operation will begin, following the cessation of TOB services in those frequencies. Kepler supports these timeframes and appreciates the efforts to make this process timely.⁵ In particular, Kepler agrees with the proposal to shorten the transition time in remote areas.⁶ By both ensuring access to the band for MSS use as soon as possible, as well as optimizing the use of spectrum as a whole, ACMA is facilitating the swifter provision of MSS services by reducing the notable barriers currently posed by a lack of spectrum availability for MSS applications. This transition will particularly benefit the provision of IoT which will in turn significantly bolster the growth of Australian space services as a whole.

Kepler looks forward to responding to the ACMA’s anticipated proposals to “include support for complementary ground component (CGC) and direct air-to-ground communications (DA2G”) services” when they are released later this year.⁷

Respectfully submitted,

⁴ Outcomes Paper at Appendix B.

⁵ Consultation Paper at 7 (“TOB services in metropolitan areas are required to cease operation in the 2 GHz band by 28 February 2026”).

⁶ Consultation Paper at 8 (Proposing to end the transition period on the 29th February, 2024).

⁷ Consultation Paper at 10.



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