

Comments from Thuraya Telecommunications Company on the 2nd Draft Frequency Migration Regulations and Frequency Migration Plan, published by ICASA

Introduction

Thuraya Telecommunications Company PJSC (“Thuraya”) thanks the Independent Communications Authority of South Africa (“ICASA”) for providing the opportunity to comment on the Draft Frequency Migration Regulations and Draft Frequency Migration Plan. Kindly note that Thuraya has studied the ICASA’s discussion paper and is pleased to submit its comments on the discussion paper as following:

We would like to start with introduction and background information on Thuraya Telecommunications Company with the following general information:

- Thuraya is a Mobile Satellite Service (MSS) Operator based in United Arab Emirates. Thuraya was incorporated in 1997 and started commercial operations in year 2001 after the launch of its first satellite Thuraya-1 in year 2000. This was followed by launch of Thuraya-2 in year 2003 and Thuraya-3 in year 2008.
- Thuraya is a leading MSS Operator and has a footprint over 140 countries in Africa, Europe, Asia, Australia and parts of Pacific.
- Thuraya currently uses MSS L band (1525-1559 MHz and 1626.5-1660.5 MHz) for the service link and FSS extended C band (3400-3700 MHz and 6425-6725 MHz) for the feederlink operations. These frequency bands are extensively used across Thuraya coverage and are essential and critical for the continued operation of Thuraya system and satellites.
- Thuraya has submitted filings with the ITU for the use of extended L-band MSS frequency range 1518 -1525 MHz and 1668 - 1675 MHz as well as S band MSS frequency range 1980-2010 MHz and 2170-2200 MHz at some orbital positions.

General Comments on the Draft Frequency Migration Regulations and Draft Frequency Migration Plan published by ICASA:

Thuraya would like to submit the following general comments on any possible use of satellite frequency bands in L, S and C band that are available on a global basis by Broadband Fixed Wireless Access (BFWA) in South Africa.

Thuraya appreciates and supports the views of ICASA to maintain the “no change” position for the frequency ranges:

- 1518-1525 MHz
- 1668-1675 MHz
- 1530-1559 MHz
- 1626.5-1660.5 MHz
- 2483.5-2500 MHz
- 1980-2010 MHz
- 2170-2200 MHz
- 3600-4200 MHz

Thuraya however has concerns on the proposal to allocate the band 1525-1530 MHz to fixed links (Fixed Service - "FS"). The band 1525-1530 MHz (downlink) and the corresponding uplink band of 1626.5-1631.5 MHz are available on a global basis for MSS and are also used by Thuraya over its network. It is to be noted that the FS and MSS are not compatible and cannot share the same band and the FS will therefore likely cause interference to MSS. This will affect the availability of the 1525-1530 MHz and corresponding uplink band 1626.5-1631.5 MHz not only in South Africa but in other countries and maritime areas.

In addition, it is to be noted that the L-band is heavily used and is extremely congested. The L band MSS frequency range is shared by a number of Satellite Operators who are introducing innovative services and applications to meet different market needs and requirements. Therefore un-availability of any part of spectrum in the 1525-1559 MHz and 1626.5-1660.5 MHz will put a severe constraint on the Satellite operators and their existing operations, service continuity and restrictions on growth, development and innovation.

Thuraya therefore recommends that in line with the proposal for "no change" in other satellite frequency bands as mentioned above, no changes be made in the 1525-1530 MHz in order to introduce FS in this highly congested and heavily used band by the MSS.

Once again, we would like to thank ICASA for giving us the opportunity to share our views. In case of any clarification or further information, please do contact us. Thuraya is available for any further consultation with ICASA on the subject issue.

Yours Sincerely,

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