

1 June 2015

The Manager  
Space and National Interest Planning Section  
Spectrum Infrastructure Branch  
Australian Communications and Media Authority  
PO Box 78  
BELCONNEN ACT 2616

By email: [satellite.coordination@acma.gov.au](mailto:satellite.coordination@acma.gov.au)

Dear Sir/Madam

The Australian Subscription Television and Radio Association (ASTRA) welcomes the opportunity to comment on the Consultation Paper 'Proposal to remake the Radiocommunications (Communication with Space Object) Class Licence 1998 and to make the Radiocommunications (Radionavigation-Satellite Service) Class Licence 2015.'

ASTRA restricts its comments to those proposals which are relevant to its members' interests as users of television outside broadcasting (TOB) spectrum.

*Q2. Is the proposal to remove the mobile-satellite service frequency ranges 1980–2010 MHz and 2170–2200 MHz from the space object class licence supported? If so, or if not, why?*

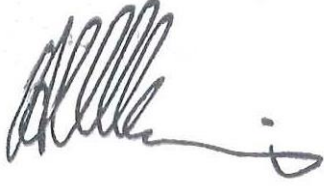
ASTRA supports the removal of the frequency ranges 1980-2010MHz and 2170-2200MHz from the space object class licence, because of the ongoing use of these bands for TOB. Removal of MSS bands from the class licences would give incumbent licensees, such as Fox Sports, certainty regarding the prospects for licence renewal.

*Q3. Are the changes proposed by the ACMA with respect to the operation of mobile ship stations by qualified operators and in accordance with relevant Resolutions of the IMO supported? If so, or if not, why?*

ASTRA would need to ensure that maritime mobile DTH earth stations remain licensed under the space object class license. There are a number of DTH earth stations on pleasure and commercial vessels for the reception of Foxtel and VAST television services within Australian waters.

Please feel free to consult Holly Brimble, Policy and Regulatory Manager on 02 9776 2688 if you have any queries relating to the above.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Andrew Maiden', with a long horizontal flourish extending to the right.

Andrew Maiden  
CEO