



February 27, 2022

Radio.Spectrum@mbie.govt.nz

Re: Comments in Response to Draft Five Year Spectrum Outlook

EchoStar Global Australia Pty Ltd (EchoStar Global) submits these comments in response to the Radio Spectrum Management (RSM) New Zealand above-referenced consultation. EchoStar Global, a subsidiary of EchoStar Corporation and a global satellite operator, is developing a global non-geostationary orbit Mobile Satellite Service (MSS) system in the 1980–2010 MHz and 2170–2200 MHz (2 GHz) bands, with its feeder links operating in the 5150–5250 MHz and 7025–7075 MHz bands (6 GHz band).¹ EchoStar Global has actively participated in the New Zealand proceedings to enable the use of the 2 GHz band for MSS with a ground component and the 6 GHz band for feeder links and looks forward to future discussions so that it can ultimately provide its services to users across New Zealand.

First, EchoStar urges the RSM to move forward as soon as possible for completing its licensing regime for the use of the S band spectrum for both MSS and a terrestrial component. By doing so, New Zealand will enable the most intensive use of this valuable spectrum band. In addition, the Ministry should allow the most flexible use of the spectrum, and not identify it for one service, such as aeronautical use, and provide for 2 licensees in the band, each with access to 15x15 MHz of spectrum. This will enable the market demand to drive the spectrum to be used most efficiently and meet the needs of New Zealanders.

Further, to make the most efficient use of the 6 GHz band, the RSM should not permit any IMT use in this band. The upper 6 GHz band is very important for incumbent fixed satellite services, such as EchoStar's feeder link use in the 7025–7075 MHz band. Feeder links are essential to delivering service to end users. Allowing IMT operations in this band would create an unacceptable risk of harmful interference due to its ubiquitous, high-power use that would jeopardize services to New Zealand customers. In particular, aggregate interference from terrestrial services in fixed satellite services (including MSS feeder links)—whether those services are licensed or not—is a significant and growing concern.

Regarding indoor unlicensed use, RSM should remain cautious when considering opening the upper 6 GHz band to WLAN, recognizing that most countries have not permitted additional terrestrial use of the band. For example, in Europe, CEPT has focused on the lower 6 GHz band only and has not taken any action with regard to the upper 6 GHz band.²

EchoStar Global appreciates the opportunity to comment on this consultation. We commend RSM's focus on progressing important spectrum issues. By moving forward with creating a flexible and efficient use of the 2 GHz band, and providing continued access for feeder links in

¹ EchoStar Global's affiliates, including EchoStar Mobile Limited in Europe, have extensive experience in providing MSS with a terrestrial component in the 2 GHz band. For more information, visit www.echostarmobile.com.

² CEPT, ECC Newsletter, [Europe prepares to harmonise the 6 GHz spectrum band for Radio Local Area Networks](#), Aug. 2019.

the 6 GHz band, New Zealand will enable the use of innovative services to users across the country.

Respectfully submitted,

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