



10 December 2025

Allocation of 24 – 30 GHz radio spectrum
Radio Spectrum Management Policy and Planning
Ministry of Business, Innovation and Employment
PO Box 2847
WELLINGTON 6140

Via email: Radio.spectrum@mbie.govt.nz

Dear Sir/Madam

ALLOCATION OF 24 – 30 GHz RADIO SPECTRUM

This input provides the views of EchoStar Corporation (“EchoStar”) in response to the Ministry’s consultation document on the allocation of radio spectrum in the 24 to 30 GHz frequency band.

EchoStar’s response to this consultation document focuses on our future use and licensing of ESIM satellite services in New Zealand. EchoStar is a United States based satellite services company specializing in providing ubiquitous connectivity with innovative networking technologies. Our proprietary solution employs geostationary (GSO) and low Earth orbit (LEO) satellite networks to provide a seamless experience using Earth Stations in Motion (ESIMs). As part of our offering, we will provide in-flight connectivity to deliver first-class Wi-Fi experience to passengers on board aircraft flying over and into New Zealand.

EchoStar’s service will be operated using ESIMs that are duly licensed by the authorities where the commercial aircraft is registered and fully compliant with applicable International Telecommunications Union (ITU) Recommendations and Resolutions. The service will be available only to passengers and crew for non-safety related communications while they are within the aircraft, noting that operations are consistent with APT’s reports APT/AWG/REP-135¹ and APT/AWG/REP-137.²

GURL-style, or licence-exempt, operation is employed in many countries to allow public access to the bands where interference issues do not exist, or where individual licences provide no benefit. New Zealand has employed this approach in many bands and for many services, including for satellite ESIMs operation. EchoStar is offering services utilizing ESIM operations in both the Ka and Ku Bands. In particular, the Ka-Band provides for services requiring wide channel bandwidth which translate into faster connectivity speeds. This is particularly attractive to consumers. We support the continued availability of GURLs for ESIMs operation in the 29.5 to 30.0 GHz band (i.e. no change), as well as providing new GURLs for operation in the frequency band 27.5 to 29.5 GHz.

EchoStar notes that the Ministry is doubtful that mobile operation will be required, or established, in the mmWave bands in the short or medium term and we agree with the Ministry on this point. We also note that satellite services in the bands are already available. The coordination of these satellite services internationally means that additional licensing for the purpose of interference management is not necessary and, as a further point, GURLs

¹ APT/AWG/REP-135, dated May 2023. Available at: https://apt.int/sites/default/files/report/2024/06/APT_AWG_REP-135_APT-AWG-REP-135.docx

² APT/AWG/REP-137, dated Marc 2024. Available at: https://apt.int/sites/default/files/report/2024/06/APT_AWG_REP-137_APT-AWG-REP-137.docx



allow international satellite operators to provide fast and cheap access to satellite services for New Zealanders.

Should the Ministry insist on providing mobile services in the band 27.5 to 28.35 GHz, we believe that any interference from ESIMs would at most be largely itinerant. The means that the band would still be suitable for GURL operation, for both mobile and satellite services (on a non-interference basis), especially for use onboard commercial aircraft flying at cruise altitude and to operations at commercial airports for the limited amount of time when aircraft are transferring passengers from a gate to a runway or vice versa. If we are incorrect and it can later be shown there are demonstrated interference issues, then the mobile operator could consider operation in the bands below 27.5 GHz (when available), or the Ministry could consider a suitable licensing process in the frequency band 27.5 to 28.35 GHz.

Proposed changes that provide for licensing of ESIMs in the Ka-Band would create additional costs, and delays in providing service, including the cost of and delay in obtaining a licence, annual licence fees, and significant regulatory burdens to certify and establish a local entity. These costs can be substantial and often re-occur whenever an additional service is established, or changes are made to the existing services. Necessarily, these costs would be passed on to the customers.

One licensing proposal for ESIM presented in the consultation document restricts the operation in highly populated areas, for example an aeroplane approaching Auckland airport, but potentially would allow operation when stationary at the airport. We do not support this approach as we consider it to be both difficult to implement and unnecessary.

We look forward to the continued availability of GURL to provide for ESIMs operation in the 29.5 to 30 GHz frequency band, as well as provision of new GURLs to allow ESIMs operation in the 27.5 to 29.5 GHz frequency band.

Yours sincerely

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