



23 May 2005

Diana Kennedy  
Ofcom  
Riverside House  
2a Southwark Bridge Road  
London SE1 9HA

**ESOA Response to a Consultation on:  
Short Range Radars at 24 GHz – Exempted Use from Licensing**

Dear Mrs. Kennedy,

The European Satellite Operators Association ESOA is pleased to have the opportunity to participate in the above-mentioned consultation by providing you with the general views below. Although this consultation mainly deals with implementation of measures adopted at European level, ESOA wishes to summarize the views expressed by some of its members on the use of Short Range Radars at 24 GHz, in a license exempt environment.

ESOA acknowledges that the consultation document is aimed at strictly implementing the 2005 EC Decision taken after the CEPT decision on SRR at 24 GHz. This is a very sensitive area where satellite operations need to be carefully looked after, due to the status of the 24 GHz band.

ESOA agrees with Ofcom's statement that: "Broadcast Satellite services use the 24GHz band for services in the direction earth to space. Following compatibility studies relevant national administrations have concluded that no compatibility problems exist if emissions of short-range radar are limited to, no more than, -61.3 dbm/ MHz below 22 GHz."

On the other hand, interference might occur, as Ofcom acknowledges: "There is a risk that the proposals for limiting the impact of SRR on other users of this band are unsuccessful and SRR use of the 24GHz band creates inference for other uses. Given the significant infrastructure investment involved in the other uses of this band, such as fixed links and RAS, undue interference could impose significant costs on these users. However there are a number of measures which Ofcom could take to mitigate this risk."

Among these measures, Ofcom is committing to monitor the usage of the band through the timely verification of the total number of vehicles registered, placed on the market or put into service equipped with 24 GHz SRR. "This

data will be collected on a yearly basis and shall be used to verify that the number of SRR devices on the market in the UK does not exceed the level of 7% of the total number of vehicles in circulation." This threshold is actually enshrined in the EC Decision, and ESOA would respectfully insist that Ofcom sticks to these conditions, in light of abovementioned limits.

ESOA hopes that you will find our contributions useful, and we remain at your disposal for any further information you may require.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Aarti Holla-Maini', with a stylized flourish underneath.

Aarti Holla-Maini  
Secretary General  
ESOA