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VIA E-MAIL to NBNreview@communications.gov.au

14 March 2014

NBN Regulatory Review
Department of Communications
GPO Box 2154
Canberra ACT 2601

Re: Panel Conducting a Cost-Benefit Analysis and Review of Regulatory Arrangements for the National Broadband Network – Regulatory Issues Framing Paper (“the Consultation”)

Dear Sir/Madam,

O3b Teleport Services (Australia) Pty Ltd¹ respectfully submits this letter in response to the Consultation, and is grateful for the opportunity to work with the Department of Communications and the Panel of Experts to consider the regulatory arrangements for Australia’s National Broadband Network (the NBN). O3b holds multiple apparatus licenses in Australia and is a licensed Australian telecommunications carrier².

O3b has launched a new Ka-band, non-geostationary satellite system (“NGSO”) that offers very high speed broadband connectivity to Australia and around the globe. Our first four satellites were launched in June 2013, and we have another four anticipated to be launched in mid-2014. O3b has established a gateway earth station in Perth, Western Australia, and another one in Dubbo, New South Wales.

O3b notes that the Panel of Experts that put out the Consultation was asked to “consider ... the respective benefits of alternative/potential technologies.”³ O3b itself is an example of a possible alternative infrastructure provider, but rather than being a competitor to NBN Co, O3b should be seen as a complementary provider of infrastructure that NBN Co (or Telstra, or Optus, e.g.) would use as an additional technology to provide broadband services to their own end user customers.

¹ O3b’s Client Identifier is 20011768; its ABN is 55 386 169 386. O3b Teleport Services (Australia) Pty Ltd is a wholly-owned subsidiary of O3b Limited, a Jersey (Channel Islands) entity.

² Carrier licence CAN 161 700 509.

³ “Panel of Experts - Terms of Reference,” term 1(a).

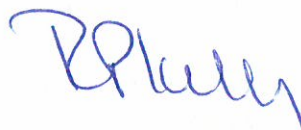
O3b does not provide broadband services direct to individual consumers. O3b provides middle-mile connectivity for telecommunications operators, ISPs, large enterprises (like mining, energy and off-shore platforms), and governments. O3b's medium-Earth orbit means our round-trip latency is less than 150 ms, much lower than geostationary satellites. O3b's bandwidth and low latency are comparable with fiber, so O3b can provide mobile backhaul compatible with all forms of last-mile solutions (2G, 3G, WiMAX, LTE, etc.). This gives O3b a unique position in the satellite industry. O3b substitutes for long-haul fiber in capacity, with the reach to rural, isolated, and remote areas that only satellites can provide.

Conclusion

In sum, O3b's global MEO satellite system offers broad coverage, high capacity, and low latency, and could be an ideal addition to the multiple alternative infrastructures now being considered for the National Broadband Network. O3b would welcome the opportunity to work with NBN Co and the Australian Government to contribute to innovative, high-speed, low-latency backhaul solutions for the remote and isolated regions of Australia and its territories.

O3b thanks the Department of Communications and the Panel for the opportunity to comment on the Framing Paper's Consultation. Please direct any questions that you may have to me or to Mr. John Turnbull, Director, O3b Teleport Services (Australia) Pty Ltd: +614 215 54 497.

Sincerely,



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Cc: John Turnbull, Director
Joslyn Read, Vice President, Regulatory Affairs