



24 July 2020

Rachel Blackwood

A/g Assistant Secretary

Spectrum & Telecommunications Deployment Policy Branch

Department of Infrastructure, Transport, Regional Development and Communications

GPO Box 2154

Canberra, ACT 2601

Email: rachel.blackwood@communications.gov.au

Re: Exposure draft of Radio Communications Legislation Amendment (Reform and Modernisation) Bill

Dear Ms. Blackwood,

Viasat is building the world's fastest and highest-capacity commercial satellite broadband network. By 2022, with the launch of the third ViaSat-3 satellite to cover Australia and the Asia-Pacific region, Viasat will have full global coverage with the ViaSat-3 constellation. To achieve this level of innovation, Viasat has designed and is building a state-of-the-art satellite platform.

The ViaSat-3 satellite design provides nearly 10 times the bandwidth of ViaSat-1 (130 Gbit/s), over four times the capacity of ViaSat-2 (260 Gbit/s), and 14 times the bandwidth of each nbn Sky Muster (70 Gbit/s). The ViaSat-3 satellites will provide significant benefits to Australia, including high-quality, affordable broadband to support all Australians; secure communications for Defence and national security purposes, and support for emerging mobile and IoT applications. In order to support the speed and capacity on the ViaSat-3 network, Viasat requires an extensive ground gateway network connected to high-quality fibre.

A key part of the ViaSat-3 network in Asia-Pacific is the ground infrastructure which Viasat is building in Australia¹ to support Australia and the full Asia-Pacific region. Viasat has also made innovations in gateway technology, reducing the size of gateway earth stations, and increasing their capacity. To enable Viasat to provide this advanced technology, reliable spectrum access throughout the entire 28 GHz band is critical.

Viasat appreciates the opportunity to provide comments on the 2020 Radiocommunications Reform consultation paper. The legislation will appropriately clarify the purpose of the Act and the roles of the Minister and the ACMA.

¹ See "Australia could host ground infrastructure for next gen Viasat satellite", ComputerWorld, 9 Feb. 2019.

Spectrum Planning:

Viasat supports the initiative to pass more planning and allocation powers to the ACMA subject to Ministerial policy statements. Viasat will work with the ACMA in the new environment to ensure that it has the information necessary to inform its decisions on spectrum licensing, including for satellite spectrum access. This is especially important because of the customers, both government and commercial, that Viasat will serve on the ViaSat-3 network, which will offer service to all Australians, wherever they may go.

It is important to note that the ability to deliver high-quality broadband services by satellite requires a significant upfront investment. Therefore, it is important for satellite services to have a predictable and stable spectrum environment that allows for innovation and growth.

Viasat welcomes the formalisation of the 'Five Year Spectrum Outlook' through the requirement of an annual spectrum work program. This will help inform industry of any proposed changes and allow the ACMA to hear directly from spectrum users as they develop licensing regimes. Viasat also supports the Minister's proposed role to provide broader guidance on major policy issues to the ACMA as it fulfills its role.

Streamlining spectrum allocation and reallocation:

Viasat welcomes any initiative that streamlines the processes of spectrum allocation and licensing. Viasat notes, however, that when new bands are being made available for services that the ACMA must have the tools and information necessary to make decisions that benefit the entire communications ecosystem, including satellite services.

Viasat is particularly interested in the Ka-band and the 28 GHz band within the Ka-band. Viasat has been very active in the 28 GHz consultation process and looks forward to using the spectrum once ViaSat-3 becomes operational. Just as with terrestrial services, in order to provide satellite broadband services in Australia, Viasat requires long-term access to adequate spectrum resources. This is true for both the cities and remote areas. Whether on a plane at the gate at Sydney airport, on ferries in ports, with government missions at home and around the world, or providing broadband services to residential and enterprise customers, the demand for satellite broadband is ubiquitous.

Improve flexibility and reduce regulatory barriers between license types:

It costs billions of dollars to design, launch, and operate a satellite network. The lifespan of a communications payload is up to 25 years. The availability of a 20-year license will go a long way toward meeting the level of stability that satellite operators need when making investment decisions.

Viasat understands the need for a public interest review when renewing a 20-year license, however, any such evaluation must consider the value of the in-orbit and terrestrial support as well as the customer base.



Overall, Viasat applauds the initiative to make surgical changes to the existing Act as these have the potential to make significant positive improvements to the way spectrum is managed in Australia.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Girvan". The signature is written in a cursive, flowing style.

Peter Girvan
Vice President and General Manager,
Viasat Asia-Pacific