

# MEASAT

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**Senior Telecommunications Engineer (Spectrum Planning)  
Office of the Telecommunications Authority**

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Dear Sir,

## **MEASAT'S COMMENTS TO OFTA'S CONSULTATION PAPER ON SPECTRUM UTILIZATION FEE (SUF) FOR SPECTRUM ADMINISTRATIVELY ASSIGNED**

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MEASAT is pleased to provide its comments to OFTA's Consultation Paper on Spectrum Utilization Fee (SUF) for Spectrum Administratively Assigned. MEASAT is a satellite operator and, thus, provides its comments related to satellite services only.

MEASAT is in view that the proposal to apply the Spectrum Utilization Fee (SUF) in the frequency bands allocated to satellite services may not appropriately address the issue of spectrum congestion.

The frequency bands to be utilized for satellite services are allocated through the Table of Allocation of the ITU Radio Regulations. There are existing regulations and procedures in order to ensure that the frequency bands used do not cause harmful interference to existing satellite users and other services. Additionally, ITU study groups continually studies ways to accommodate future users.

It is already the requirement to coordinate internationally for use of satellite spectrum. In fulfilling the ITU regulations and procedures, it should be adequate for satellite earth stations to establish satellite links without causing interference into other services. As such, there should not be any limitation to the number to earth stations deployable, and hence, there should not be any congestion issue in the satellite bands.

Implementing the SUF on the satellite bands may only steer the satellite operators away from operating in Hong Kong, which we presume is unintended while trying to address the issue of congestion.

MEASAT would appreciate if OFTA would consider our comments on the need to implement SUF for satellite bands and further analyze the economical impact on the satellite industry.

Yours faithfully,  
For and on behalf of  
**MEASAT Satellite Systems Sdn Bhd**

A handwritten signature in black ink, appearing to read 'Teh Chin Eng', with a horizontal line extending from the end of the signature.

**Mr. Teh Chin Eng**  
Manager, Spectrum Management