



28 March 2022

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cc: Amela Hatibovic Sehic

TRANSMITTED VIA EMAIL: 900-2100-2600@pts.se

RE: Consultation of PTS consideration of coordinated allocation of 2.6 GHz and 2.1 GHz frequency bands

Dear Ms. Beckius, Ms Sehic:

Inmarsat is pleased to provide further comments to PTS on your plans regarding the 2.1 GHz band as described in the consultation document: “Konsultation inför planerat auktionsförfarande för tilldelning av tillstånd i 900 MHz-, 2,1 GHz- och 2,6 GHz-banden”. This is also in follow up to our previous submissions (of 1 September 2020, and 12 February 2021), in which we proposed certain protection measures needed to address compatibility with Inmarsat's EAN network (operating in bands 1980-1995 MHz and 2170-2185 MHz) in Sweden. Our prior proposal included measures to: (a) maintain the 300 kHz guard band below 2170 MHz in the new 2.1 GHz licenses, and (b) include a condition (in any newly issued 2GHz licences) that would require coordination with Inmarsat at Stockholm and Gothenburg airports. This coordination requirement would be critical in helping avoid possible harmful interference where EAN operates.

Regarding our second point in particular, we would reiterate that potential interference to Inmarsat's EAN system can be adequately managed, provided that operators seeking to deploy base stations in or near to airports coordinate with Inmarsat before deployment. As noted in our previous submission, the following requirement is identified in ECC Report 298 (section A2.4):

“The MSS allocation directly adjacent to MFCN above 2170 MHz is used for EAN applications. Therefore, the only possible interference from MFCN base stations may occur while the MSS receiver in an aeroplane is on the ground. If an additional protection is still needed, it can be granted by applying coordination procedures for MFCN base stations around airports, instead of a mandatory guard band for CEPT countries.”

Inmarsat thus further requests that PTS adopt the findings of the CEPT studies and ensures that new licensees of MFCN systems in the 2 GHz bands coordinate with Inmarsat operations at the major commercial airports where EAN operates - Stockholm and Gothenburg - to ensure that harmful interference will not be caused to EAN operations in Sweden.

Understanding that PTS plans to proceed with new frequency arrangements for the 2 GHz band that remove the 300 kHz guard band between MFCN and MSS, there will be an increased risk of interference to EAN operations in Sweden. However we could not see any discussion on the requirements for compatibility with MSS in the current consultation document and no reference to a requirement for coordination of base stations close to coordinate with EAN.

Thank you for the opportunity to contribute to the current consultation. Inmarsat would be pleased to further engage with PTS as necessary to answer questions or discuss the details of these issues at your convenience.

Respectfully submitted,

Paul Deedman
Director, Spectrum Regulation, Regulatory Engineering
Inmarsat.