

3 February 2021



**Mark Arkell**  
Manager  
Space Systems  
Spectrum Planning & Engineering Branch  
Communications Infrastructure Division  
Australian Communications and Media Authority  
Email: mark.arkell@acma.gov.au

Dear Mark

**RE: Updates to the Foreign Space Objects Determination and the Australian Space Objects Determination consultation**

The Communications Alliance Satellite Services Working Group (SSWG) welcomes the opportunity to comment on the ACMA's *Updates to the Foreign Space Objects Determination and the Australian Space Objects Determination* consultation.

Overall, the SSWG observes that the draft Determinations look reasonable but would like to draw to the ACMA's attention one editorial correction - on Page 1 of the draft *Radiocommunications (Australian Space Objects) Amendment Determination 2021 (No. 1)*, the name of the Determination in Section 1 incorrectly refers to the Foreign Space Objects Amendment.

The SSWG also confirms the validity of the proposed changes to the two Determinations in relation to those organisations who are members of the SSWG, specifically EchoStar, Intelsat, O3b (SES) and Viasat.

Although structural changes to the Determinations are thought to be beyond the scope of this consultation, the SSWG may provide further comments in this year's FYSO 2021-2025 consultation, returning to observations that were made in an earlier Communications Alliance submission<sup>1</sup>. Last year, the *Radiocommunications Act* underwent amendment, rather than a proposed rewrite that was initially anticipated. A number of industry proposals were not picked up in the development of the amended Act, including the proposal for the rationalisation of the Foreign and Australian Space Objects Determinations into a single document and removing unnecessary duplication. The SSWG encourages the ACMA to revisit the merits of simplifying this aspect of space legislation.

Finally the SSWG supports proposed amendments to Schedule 1 of the Foreign Space Objects Determination to include the following SSWG member(s) as owners, controllers or operators of foreign space objects:

- > O3b Limited (incorporated in Jersey)
- > Viasat, Inc. (incorporated in the United States of America).

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<sup>1</sup> Communications Alliance response to the ACMA *Proposal to remake Radiocommunications (Australian Space Objects) Determination 2000 and Radiocommunications (Foreign Space Objects) Determination 2000* – July 2014. [https://www.commsalliance.com.au/\\_data/assets/pdf\\_file/0006/45924/CA-response-on-ACMA-Foreign-Space-Objects-Consultation.pdf](https://www.commsalliance.com.au/_data/assets/pdf_file/0006/45924/CA-response-on-ACMA-Foreign-Space-Objects-Consultation.pdf)

The addition of these networks will enable additional high value communications services to Australia and particularly Australians living in rural and regional areas of Australia and industries in those areas such as mining and agriculture. In addition to providing broadband services to all Australians regardless of where they may live the ViaSat 3 network will provide these services to aircraft both in the air and on the ground, enhancing the travelling experience and assisting airlines to recover from the effects of COVID-19, to ships at sea and to land based vehicles.

If you have any questions with respect to this submission, please contact Mike Johns at Communications Alliance on 0414 898 841.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Stanton', written in a cursive style.

John Stanton  
**Chief Executive Officer**

### **About Communications Alliance**

Communications Alliance is the primary telecommunications industry body in Australia. Its membership is drawn from a wide cross-section of the communications industry, including carriers, carriage and internet service providers, content providers, equipment vendors, IT companies, consultants and business groups. Its vision is to provide a unified voice for the telecommunications industry and to lead it into the next generation of converging networks, technologies and services. The prime mission of Communications Alliance is to promote the growth of the Australian communications industry and the protection of consumer interests by fostering the highest standards of business ethics and behaviour through industry self-governance.

For more details about Communications Alliance, see:

<http://www.commsalliance.com.au/>