



**Consultation on Public Satellite Telecommunications Networks and Services License  
and Associated Frequency License**

**Summary of Comments Received and Response of the Regulatory Authority**

**7<sup>th</sup> October 2013**

## **Content**

Comments received and ictQATAR-RA's responses.

## **Purpose of this document:**

1. To summarize and review the responses received to the Consultation on Public Satellite Telecommunications Networks and Services License and Associated Frequency License.
2. To provide ictQATAR-RA's response to the key comments received.
3. To enable ictQATAR-RA to prepare the final version of Public Satellite Telecommunications Networks and Services License and Associated Frequency License.

## **Respondents:**

Responses were received from:

1. Ooredoo
  2. Vodafone
  3. Es'hailSat
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## Comments received and RA's response

The table below presents the questions raised by ictQATAR in the Consultation and the comments received.

### Consolidated Major Comments from all Respondents

No.	Responder	Comments	RA response with rationale
1	Ooredoo	<ul style="list-style-type: none"> <li>Ooredoo expressed concerns that Annexure B of the proposed Satellite License would enable the licensee to provide broad range of telecom services to retail customers in Qatar which will pose a direct competition to Ooredoo and Vodafone. This will cause a fundamental structural change in the telecom market of Qatar.</li> <li>Ooredoo added that it was understood that a satellite operator in Qatar would only be a provider of wholesale services.</li> <li>Ooredoo has requested to limit the activities of the satellite licensee to the provision of wholesale services only.</li> </ul>	<ul style="list-style-type: none"> <li>The license will enable access at a retail level to satellite capacity for Qatar's TV broadcasters for 2022 and beyond as well as an alternative route for essential data connections outside Qatar and providing capacity for security &amp; disaster recovery purposes. Global experience shows that other services provided by satellite at a retail level fall into niche markets that either will have minimal impact on the business of existing licensees or are services not currently supported by existing licensees in Qatar.</li> </ul>
2	Ooredoo	<ul style="list-style-type: none"> <li>Ooredoo has posed questions on transparency and correctness of the consultation process carried out regarding the satellite services license.</li> </ul>	<ul style="list-style-type: none"> <li>ictQATAR did not consider it necessary to seek views on any particular issue, rather it was left open for respondees to comment on any matter of concern.</li> </ul>
3	Ooredoo	<ul style="list-style-type: none"> <li>Ooredoo has pointed out towards certain inconsistencies between the proposed satellite license and existing individual licenses issued to Ooredoo and Vodafone.</li> </ul>	<ul style="list-style-type: none"> <li>The license has been updated to ensure consistency with other licenses. The only exceptions arise where this would not be appropriate for services provided via satellite communications.</li> </ul>
4	Vodafone	<ul style="list-style-type: none"> <li>Vodafone has opposed authorizing the satellite to operate their own terrestrial facilities outside their teleports. Vodafone proposes that the satellite licensees should obtain these services from the existing Public Fixed licensees.</li> </ul>	<ul style="list-style-type: none"> <li>Provision of terrestrial facilities are only allowed to be used in association with the satellite services .</li> </ul>
5	Vodafone	<ul style="list-style-type: none"> <li>Vodafone submits that the satellite licensees should not be allowed to provide any telecom networks or service exclusively using their terrestrial network elements or facilities .</li> </ul>	<ul style="list-style-type: none"> <li>Exclusive provision of terrestrial telecom networks and services is already excluded from scope of the satellite license.</li> </ul>
6	Es'hailSat	<ul style="list-style-type: none"> <li>Es'hailSat suggested some minor changes in the draft frequency and service licenses e.g. to replace the term "Space Segment Capacity" with "Downlink Spectrum" in the Frequency License.</li> </ul>	<ul style="list-style-type: none"> <li>Suggestions have been accepted where appropriate.</li> </ul>

## Conclusion

The draft Service and Frequency licenses for satellite services have been reviewed and updated (where necessary) in accordance with the comments made by the respondees.

The Licenses will be published when they are issued.

## **Annexure 1 – Individual Responses from the Industry**



**OOREDOO RESPONSE:**  
**ICTQATAR - 20 JUNE 2013**  
**DRAFT PUBLIC SATELLITE TELECOMMUNICATIONS NETWORKS AND**  
**SERVICES LICENSE**  
**AND**  
**ASSOCIATED FREQUENCY LICENSE**

21 July 2013

## 1. Introduction

1. Ooredoo is pleased to provide its comments with regard to the Consultation Document titled Public Satellite Telecommunications Networks and Services License and Associated Frequency License, issued 20 June 2013 ("Draft License").
2. Ooredoo has two principal concerns with regard to issuance of the Draft License at this time. First, the broad scope of the "authorized services" as set out in Annexure B of the Draft License would allow the new licensee to offer a wide range of public telecommunications services directly to retail customers in competition with Ooredoo and Vodafone Qatar in a manner not contemplated by policies articulated in ictQATAR's Strategic Sector Review and other policy documents.
3. Second, we believe that the process used to develop the Draft License is lacking in transparency and highlights the need for ictQATAR to develop a comprehensive decision-making process that sets out specific criteria for the issuance of all new ictQATAR rules and decisions, including the issuance of new licenses.
4. Finally, Ooredoo has a number of specific comments regarding observed differences between the Draft License and the Public Telecommunications Networks and Services Licenses currently held by existing providers of public telecommunications services.

## 2. Scope of Services

5. The authorization to provide telecommunications services as described in Annexure B of the Qatar Satellite Company's Draft License is extremely broad and would enable the licensee to provide a broad range of telecommunications services to retail customers in Qatar in direct competition with Ooredoo and Vodafone Qatar. The only limitation on the services that may be provided is that the services provided may not be "provided exclusively using terrestrial network elements or facilities."
6. Ooredoo is concerned that enabling the licensee to provide a broad range of retail telecommunications services would constitute a fundamental structural change in the telecommunication market in Qatar; one that has not been the subject of discussion or consideration in the context of the Strategic Sector Review or other telecommunications strategy processes undertaken by ictQATAR. While it has long been understood that a new satellite operator would enter the market, it had been understood that this operator would be a provider of wholesale services only, and that entry of a satellite operator would not impact the retail telecommunications services market. Ooredoo is concerned that the entry of an additional player in this space has the potential to upset carefully planned

investment and other initiatives that may no longer be viable with the entry of a new breed of retail telecommunications service provider.

7. Moreover, Ooredoo also has significant concerns regarding the language of Annexure B of the Draft License, and specifically the broad range of retail telecommunications services that the new licensee would be allowed to provide. For example, the only apparent limitation on the types of retail services that the new licensee may provide to the public is that such services may not be “provided exclusively using terrestrial network elements or facilities.” Thus, the licensee would be allowed to provide any telecommunications service, whether fixed or mobile to any customer in Qatar, so long as a single element of that service involved a satellite link. Thus, it is conceivable, that under the terms set out in Annexure B the licensee could, for example, provide international calling services to customers of Ooredoo and Vodafone Qatar via a satellite link and demand wholesale services from Ooredoo and Vodafone Qatar to do so.
8. Ooredoo would regard introduction of such additional competition as a major structural change in the telecommunications market in Qatar; one that requires detailed and thorough analysis and study to ensure it would not have a damaging effect on the broader telecommunications market. Ooredoo would therefore urge ictQATAR to amend the language of Annexure B to limit the activities of the licensee to the provision of wholesale services only and to introduce additional competition in the retail telecommunications services space only following comprehensive analysis and discussion with relevant interested parties.

### **3. Consultation Process**

9. Ooredoo notes that the Draft License, while titled “Consultation Document,” does not, in actuality, include any of the normal elements of a public consultation. Indeed, the document lacks an explanation for the purposes of issuing a satellite license at this time, background on the proposed terms included in the license, and reasoning for relevant decisions, nor does the document solicit input on any particular issues relevant to the Draft License. This is surprising in light of the significance to the structure of the telecommunications market and the potential impact on the industry that issuance of this license is likely to have, as well as the numerous differences between the Draft License and the Existing Licenses as described below.
10. Ooredoo would urge ictQATAR in the future when issuing new licenses to conduct a more inclusive and transparent consultation process that includes background and rationale for the various aspects of its decisions. For example, there are significant differences between the draft license and the existing licenses of established telecommunications service providers. In light of the non-discrimination requirements set out in Article 6 of the Telecommunications Law, and Clause 9 of the Existing Licenses, it would be extremely useful for existing service providers to be able to understand how ictQATAR views these differences

between licenses and the extent to which they are justified by circumstances particular to the new licensee in accordance with the ARF.

11. Indeed, Ooredoo is of the view that this proceeding highlights the need for ictQATAR to develop a uniform and comprehensive set of rules to guide the decision-making processes it undertakes. In Ooredoo's view, such a decision-making process would be uniform across specific types of decisions (i.e. license issuance, rule-making, policy-setting, etc.) and ensure that interested parties are provided with notice of all relevant decisions with regard to a particular proceeding, and which should include a detailed explanation of the rationale for each of ictQATAR's decisions. Interested parties should be provided an opportunity to comment on such information, and no final decision should be made without clearly addressing such comments of interested parties.

#### **4. Differences between Licenses:**

12. Ooredoo notes that the Draft License is modelled on the existing Ooredoo and Vodafone Qatar Fixed and Mobile Public Telecommunications Networks and Services Licenses ("Existing Licenses"), which except for minor though important differences are more-or-less identical. The Draft License, however, contains numerous instances where its language diverges from the corresponding text of the Existing Licenses, and the rationale for and legal significance of these differences is not readily apparent.
13. In general, Ooredoo supports having a uniform set of license terms that apply to all public telecommunications service providers. Having licensee providing the same or similar services that are governed by different license conditions is confusing and creates the potential for conflict and disagreement. Article 6 of the Telecommunications Law requires that regulations, decisions, orders, etc. of ictQATAR be "transparent and non-discriminatory" with respect to all service providers, except to the extent any differences are "due to circumstances particular to that service provider or other market participant." A similar requirement is set out in Article 9 of the Existing Licenses and Article 10 of the Draft License. To the extent the observed differences in language between licenses will result in differential treatment between licensees, it would be useful, for ictQATAR to provide licensees with an explanation of how it believes the treatment of licensees will be different and how such treatment is consistent with Article 6. To the extent these differences in language will not result in differential treatment, it would be useful to understand ictQATAR's rationale for including such divergent language in the Draft License.
14. The relevant differences in language are set out below. In Ooredoo's view, it is critically important for existing licensees to understand the rationale for these differences and would urge ictQATAR to issue a clear explanation of the purpose for and significance of each of the differences in licenses as noted below:

- Clause 9 of the Draft License does not appear in the Existing Licenses, and yet imposes obligations already set out in the ARF.
- Clause 11 of the Draft License differs from the corresponding clause 10 in the Existing Licenses in that Clause 10.2 is not included in the Draft License.
- Clause 13 of the Draft License is entitled "Network Roll-out and Coverage Provisions", while the text of the clause pertains to permissions, permits and other approvals. The Draft License would benefit from a revision to the heading to reflect the content of the text.
- The Draft License omits the requirement to comply with applicable basic service obligations and/or network coverage obligations as set out in Clause 12 of the Existing Licenses. To the extent the new licensee is being provided exclusive access to applicable radio spectrum, there is no clear basis for not requiring it to efficiently utilize such spectrum by constructing and successfully launching a satellite or to surrender its license after an appropriate time period. Such an obligation would be consistent with Satellite licenses issued in other markets.
- Clause 15 of the Draft License omits the obligation to comply with Universal Service obligations as contained in the Existing Licenses without apparent rationale.
- Clause 16 of the Draft License is missing the final sentence contained in the corresponding Clause 15 in the Existing Licenses.
- Clause 17 of the Draft License is also missing the final sentence contained in the corresponding Clause 16 in the Existing Licenses.
- Clause 19.2 of the Existing Licenses, which requires licensees to safeguard the confidentiality of customer communications, has been omitted from the Draft License.
- Clause 29.2 of the Existing Licenses as been omitted from the Draft License.
- The final sentence of Clause 32 as set out in the Existing Licenses has been omitted from the Draft License.
- The definition of Service Launch Date set out in Annexure A of the Draft License makes reference to "passive fixed telecommunications networks and related services". Annexure B, however, makes no reference to such services. The definition for "Service Launch Date" should be revised to reflect the authorized services as set out in Annexure B. In the alternative, since this term appears not to be used in the Draft License, the definition and term could be eliminated entirely from Annexure A.
- Clause 1.10 of Annexure D of the Existing Licenses, which contains specific requirements related to filing of tariffs regarding bundled services has been eliminated from the Draft Licenses.

- Annexure G has been omitted from the Draft License.
- Clause 1.8 of Annexure H of the Draft License omits language regarding payment of spectrum license fees found in the Existing Licenses.
- Clause 2.1 of Annexure H of the Draft License contains a different calculation for the license fee compared to the calculation set out in the Existing Licenses.
- Clause 1.1 of Annexure I of the Draft Licenses - the last sentence of this clause as set out in the Existing Licenses has been omitted without apparent rationale.
- Clause 3.6 of Annexure I of the Draft License, regarding predatory pricing, has been modified significantly as compared to the corresponding text in the Existing Licenses. Given that issues of below cost pricing are a topic of frequent discussion with ictQATAR, Ooredoo is particularly concerned that this change represents a shift away from language in the Existing Licenses that is more in accordance with accepted economic principles to a discretionary standard as contained in the Draft License, and that there appears to be little apparent rationale for this change.

## 5. Conclusion

15. Ooredoo values the opportunity to provide its input and views with regard to the Draft License. In summary, Ooredoo urges ictQATAR to reconsider its decision to allow the new licensee to provide retail telecommunications services in competition with existing service providers, and to re-evaluate the broad language describing the authorized scope of such services set out in Annexure B of the Draft License. Ooredoo also supports a more transparent and participatory decision-making process and urges ictQATAR to provide stakeholders with further information and a better understanding for its conclusions as set out in the Draft License. Finally, Ooredoo would urge ictQATAR to revert to a set of uniform license conditions for all public telecommunications service providers and bring those clauses of the Draft License into conformity with the Existing Licenses. While there certainly is room for improvement in the language in all licenses, such changes should be made uniformly to all licenses in accordance with a transparent and participatory process for doing so. In the mean time, Ooredoo is of the view that it is preferable to apply imperfect language uniformly across all licensees than to have diverging licenses with differing texts without clear and reasoned justification for such differences.



21 July 2013

Graeme Gordon  
Assistant Secretary General  
ictQATAR  
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Dear Graeme,

**Re: Vodafone's comments on ictQATAR's Consultation Document on Public Satellite Telecommunications Network and Services License ("Consultation Document")**

Vodafone Qatar Q.S.C ("**Vodafone**") appreciates the opportunity to comment on the Consultation Document.

Vodafone's comments are limited to Annexure B of the proposed license, which sets out the Authorised Facilities, Networks, Services and Activities.

Clause 1.1(d) provides that "*the licensee is authorised to install, own, import, operate and use associated terrestrial transmission facilities, which include inter alia but is not limited to terrestrial fixed links and international Gateway facilities.*" Vodafone submits that there is no reason for Satellite Licensees to be authorised to operate terrestrial facilities outside of their teleports. These services can be provided to the satellite licensees by Vodafone and other fixed licensees in Qatar.

Furthermore, Vodafone does not believe that there could be any circumstances under which the Satellite Licensees might need to provide the following services:

- Any Telecommunications Service that is provided exclusively using terrestrial network elements or facilities;
- A Public Telecommunications Network that consists exclusively of terrestrial elements or facilities.

These services can be provided to the satellite licensees by Vodafone and other fixed licensees, therefore Vodafone submits that the words "*except with the specific prior written approval of the Supreme Council*" be deleted from Clause 3.

Yours sincerely

Julian Kersey  
Head of Regulatory  
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**ictQATAR Consultation Document:**

**Public Satellite Telecommunications Networks and Services License  
and Associated Frequency License**

**Released 20 June, 2013**

**Submission by Es'hailSat**

**Filed 21 July 2013**

## **Consultation Document – License and Industry Fees for Individually Licensed Operators**

Es'hailSat welcomes this opportunity to comment on the Consultation Document on the Public Satellite Telecommunications Networks and Services License and Associated Frequency License (the “Consultation”).<sup>1</sup> Es'hailSat commends ictQATAR on the proposed licensing framework. Consistent with international best practices, the Draft Licenses reflect principles of non-discrimination, fairness, and transparency while also recognizing the unique attributes and varied uses of satellite services. Moreover, the proposed licensing framework represents a significant national achievement that will play a critical role in realizing Qatar’s National Vision 2030. For these reasons, Es'hailSat urges ictQATAR promptly to adopt and issue the Draft Networks and Services License. Es'hailSat also urges ictQATAR to adopt the associated Draft Frequency License with certain minor modifications meant to ensure consistency between the licenses.

### **I. THE DRAFT LICENSES REPRESENT A SIGNIFICANT ACHIEVEMENT FOR QATAR.**

The Draft Licenses represent a significant national achievement. Es'hailSat is poised to become the first international satellite network provider licensed in Qatar. As such, Es'hailSat will provide customers with advanced communications services, including broadcast solutions. Moreover, Es'hailSat will provide high quality, critical capacity in Qatar, addressing both current and future bandwidth demands, including for the FIFA World Cup in 2022. Es'hailSat’s next-generation satellites will improve military radio communications for Qatar’s armed forces; support affordable broadband, television, and entertainment; and deliver broadband and disaster

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<sup>1</sup> The Supreme Council of Information and Communications Technology, *Consultation Document on Public Satellite Telecommunications Networks and Services License and Associated Frequency License*, ICTRA 2013/06/20 (20 June 2013) (the “Consultation”). The Consultation invites comment on a draft License for the Provision of Public Satellite Telecommunications Networks and Services issued by the Supreme Council of Information and Communications Technology (“ictQATAR”) to Es'hailSat (the “Draft Networks and Services License”) and a Draft Frequency License for Public Satellite Telecommunications Networks and Services (the “Draft Frequency License”) (together, the “Draft Licenses”).

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recovery services in Qatar, including in regions outside of urban areas with low population density. In addition to expanded access to cost-efficient digital communications, satellite communications will help realize stronger socio-economic development through enhanced public services, including health through telemedicine, education through distance learning, and universal access through rural communications, as well as stimulate private-sector activity by attracting foreign investment and creating jobs. As a result, Es'hailSat and satellite communications will play a critical role in fulfilling Qatar's National Broadband Plan and realizing Qatar's National Vision 2030.

The Consultation's proposed licensing framework promotes regulatory certainty and parity between the various licensed services in Qatar. The Draft Licenses are consistent with licenses previously issued by ictQATAR for other services, including fixed, mobile, and VSAT licenses.<sup>2</sup> The basic provisions of the Draft Licenses track closely with the basic provisions of previous ictQATAR licenses, and there are minimal changes to annexures. The Draft Licenses have been updated, however, to reflect the unique attributes of satellite services. Annexure A definitions, for example, have been updated to include key satellite concepts and terms that are not relevant to licensees in other services. Annexure B of the Networks and Services License aptly lists "Space Segment Capacity" among Es'hailSat's Authorized Telecommunications

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<sup>2</sup> See, e.g., License for the Provision of Passive Fixed Telecommunications Networks and Services, Issued by the Supreme Council of Information and Communication Technology to Qatar National Broadband Network Company (Q.NBN), Clause 22 (July 2012) ("QNBN Passive Fixed License"); License for the Provision of Public Fixed Telecommunications Networks and Services, Issued by the Supreme Council of Information and Communication Technology to Vodafone Qatar Q.S.C., Clause 23 (April 2010) ("Vodafone Fixed License"); License for the Provision of Public Mobile Telecommunications Networks and Services, Issued by the Supreme Council of Information and Communication Technology to Vodafone Qatar Q.S.C., Clause 23 (Amended Feb. 2009) ("Vodafone Mobile License"); License for the Provision of Public Fixed Telecommunications Networks and Services, Issued by the Supreme Council of Information and Communication Technology to Qatar Telecom (QTel) Q.S.C., Clause 23 (Oct. 2007) ("QTel Fixed License"); License for the Provision of Public Mobile Telecommunications Networks and Services, Issued by the Supreme Council of Information and Communication Technology to Qatar Telecom (QTel) Q.S.C., Clause 23 (Oct. 2007) ("QTel Mobile License"); License for the Provision of Very Small Aperture Terminal ("VSAT") Networks and Services, Issued by the Supreme Council of Information and Communication Technology to QSAT Communications (Dec. 2010) ("QSAT VSAT License").

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Services. Similarly, a new Annexure C in the Draft Frequency License lists existing and planned downlink spectrum for Es’hailSat’s planned satellite, Es’hail 1. The limited changes to ictQATAR’s licensing framework in the Draft Licenses ensure the appropriate regulation of unique satellite communications while creating a regulatory regime that promotes fair competition. For these reasons, ictQATAR is to be applauded for taking this important step in the Consultation toward bringing the benefits of the Es’hailSat satellite network to the Qatari public, and it should continue with the prompt issuance of the Licenses, with appropriate minor modifications discussed below.

### **II. ES’HAILSAT SUPPORTS THE DRAFT LICENSES, AND RESPECTFULLY REQUESTS MINOR MODIFICATIONS TO ENSURE CONSISTENCY.**

Es’hailSat supports the Draft Frequency License; however, certain minor modifications may be appropriate to address inadvertent ambiguities or inconsistencies between the licenses. Es’hailSat respectfully requests that ictQATAR consider implementing these modifications prior to issuing a Final Frequency License, and Es’hailSat has set forth these proposed modifications in Appendix A, for ictQATAR’s convenience.

***Requirement for Type Approval.*** Clause 8 of the Draft Frequency License requires type approval for “the Radio Equipment used by the Licensee.”<sup>3</sup> “Radio Equipment,” however, is defined in Annexure A as including “space Radiocommunication.”<sup>4</sup> Together, these license provisions could appear to require type approval of Es’hailSat’s in-orbit spacecraft, which would be not in keeping with international best practices and also unnecessary as there is no threat of interference in Qatar from Es’hailSat’s in-orbit spacecraft. Es’hailSat respectfully suggests that ictQATAR might modify Clause 8 to make clear that Es’hailSat will not be required to seek type

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<sup>3</sup> Draft Frequency License at Cl. 8.

<sup>4</sup> Draft Frequency License, Annexure A at 13.

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approval for spacecraft.<sup>5</sup> Such clarification would promote administrative simplicity and be consistent with international best practices.

*Use of “Space Segment Capacity.”* Annexure C of the Draft Frequency License inadvertently references “Space Segment Capacity” in a manner possibly inconsistent with its definition. Both Draft Licenses define “Space Segment Capacity” to include both uplinks and downlinks.<sup>6</sup> Annexure C of the Draft Frequency License, however, only addresses downlinks.<sup>7</sup> For purposes of consistency and accuracy, ictQATAR might consider changing the title of Annexure C from “List of Existing and Planned Space Segment Capacity” to “List of Existing and Planned Downlink Spectrum.” In addition, the reference to Annexure C in Annexure B of the Draft Frequency License could be updated to provide as follows: “A list of existing and planned Downlink Spectrum is included in Annexure C.”<sup>8</sup> With these changes, the definition of “Space Segment Capacity” could be removed from Annexure A of the Draft Frequency License (in light of the fact that the term no longer is used in the license) and replaced with a definition of “Downlink Spectrum.”<sup>9</sup>

**Annexure B.** Annexure B of the Draft Frequency License is incomplete at present. The current italicized text provides a placeholder for a more detailed description “of the Assigned Radio Spectrum, including technical details of permitted equipment, geographic coordinates, azimuth, elevation, etc. and a statement as to whether the assignment is on an Exclusive/co-

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<sup>5</sup> See Appendix A.

<sup>6</sup> Annexure A of the Draft Networks and Services Licenses defines “Space Segment Capacity” as “the radio bandwidth available on the up and downlink to/from a Satellite.” Draft Networks and Services License, Annexure A at 15. In Annexure A of the Draft Frequency License, “Space Segment Capacity” is defined as “the radio bandwidth available on the up and downlink to/from a Satellite as recorded in Annexure C of the Frequency License.” Draft Frequency License, Annexure A at 13.

<sup>7</sup> See Draft Frequency License, Annexure C.

<sup>8</sup> See Draft Frequency License, Annexure B.

<sup>9</sup> See Appendix A.

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Primary or secondary basis.”<sup>10</sup> This suggests that Annexure B might address Es’hailSat’s earth stations; however, Es’hailSat expects that the earth stations would be licensed separately. As such, Es’hailSat would appreciate clarification of the scope and substance of Annexure B.

### III. CONCLUSION.

Es’hailSat commends ictQATAR on formulating Draft Licenses that reflect the principles of non-discrimination, fairness, and transparency while also recognizing the unique attributes of satellite communications. The Draft Licenses are consistent with ictQATAR’s regulation of licensees in other licensed services. Moreover, the Draft Licenses offer satellite licensees the flexibility needed to compete effectively in Qatar. With the minor modifications described above, Es’hailSat urges ictQATAR to adopt the Draft Licenses and promptly issue Es’hailSat a final Networks and Services License and associated Frequency License.

Respectfully Submitted,

[Name]

[Title]

Es’hailSat  
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21 July 2013

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<sup>10</sup> Draft Frequency License, Annexure B at 15.

**Appendix A: Proposed Modifications to Draft Frequency License**

*Modification 1: Requirement for Type Approval*

**8. Type Approval**

The Licensee shall ensure that the Radio Equipment, other than spacecraft, used by the Licensee is Type Approved by the Supreme Council and at all times complies with all applicable emission standards and technical specifications or requirements specified by the Supreme Council, from time to time, in relation thereto.

*Modification 2: Use of “Space Segment Capacity.”*

**Annexure A Definitions**

Downlink Spectrum~~Space Segment Capacity~~: the radio bandwidth available on the ~~up and~~ downlink ~~to~~ from a Satellite, as recorded in Annexure C to the Frequency License.

**Annexure B Assigned Radio Spectrum**

*In this Annex we will include a full description of the Assigned Radio Spectrum, including the technical details of permitted equipment, geographic coordinates, azimuth, elevation, etc. and a statement as to whether the assignment is on an Exclusive/co-Primary or secondary basis.*

A list of existing and planned Downlink Spectrum~~Space Segment Capacity~~ is included at Annexure C.

**Annexure C List of Existing and Planned Downlink Spectrum~~Space Segment Capacity~~**

Satellite	Band	Downlink Frequency Range
Es'hail 1	Ku [French licensed]	10,950 – 11,200 MHz
		11,450 – 11,700 MHz
	Ka Trunking	17,700 – 19.700 MHz
		Ka Broadcast