

**Одговор на пристигнат коментар по јавна расправа за
Нацрт Правилникот за радиофреквенции кои можат да
се користат без одобрение за користење на радиофреквенции**

Коментар од Телесат	Одговор на АЕК
<p>This section contains Telesat’s comments related to the use of frequency bands 27.5-30 GHz and 17.3-20.2 GHz by ESOMP communicating with NGSO satellites and to the associated ESOMP power limitations as described in the Annex of the Draft Rulebook. Telesat applauds Agency Electronic Communications’ (AEK) decision to include ECC Decision (15)04 in the Annex, so that it can be used as a reference to the operating conditions of ESOMP communicating with NGSO satellites.</p> <p>Telesat notes that this ECC decision addresses the use of ESOMP in the frequency bands 17.3-20.2 GHz (space-to Earth), 27.5-29.1 GHz and 29.5-30 GHz (Earth-to-Space). Therefore, for the avoidance of any confusion, Telesat would like to propose that the Annex should include only the specific frequency ranges as mentioned in the ECC decision.</p> <p>Telesat further notes that two types of ESOMP communicating with NGSO FSS are described in the Annex: Land and Maritime ESOMP. However, Telesat would like to highlight that the revised version of ECC decision (15)04 as amended on the 20th of November 2020 (ECC Decision (15)04) addresses also the use of Aeronautical Earth Stations on Mobile Platforms. In particular, ECC/DEC/(15)04 applies a PFD threshold to aeronautical ESOMP that should be met on the ground in order to ensure that the FS deployments are adequately protected from potential interference from Aero ESOMP. ECC/DEC/(15)04 defines also the maximum EIRP installed on aircrafts operating within the airfield boundary (should be limited to 58.4 dBW). Therefore, Telesat would respectfully propose that the Aeronautical ESOMP could be also included in the Annex to the Draft Rulebook.</p> <p>Telesat would like also to clarify with AEK the permitted maximum uplink EIRP that ESOMP could use for communicating with NGSO satellites. Telesat understands that AEK’s intention is to define a range of EIRP values for NGSO ESOMP in the Annex. However, the way the EIRP values are currently defined in the Power/magnetic field column (34dBW-), imply that a maximum EIRP value is yet to be defined. In any case, Telesat would like to highlight that 34 dBW would not be sufficient for the ESOMP communication with NGSO satellites.</p> <p>In fact, the ECC/DEC/(15)04 addresses the maximum EIRP for all types of NGSO ESOMP. These limits ensure compliance with aircraft HIRF protection criteria based on ECC report 272. In particular, for Land based ESOMP operating outside the airfield boundary and for ESOMP on vessels, the maximum EIRP should be limited to 70 dBW while for Land ESOMP operating within the airfield boundary EIRP shall be limited to 52.4 dBW. In addition, as already mentioned above, the maximum EIRP of ESOMP installed on aircraft operating within the airfield boundary shall be limited to 58.4 dBW.</p> <p>Many CEPT countries have already included the above mentioned EIRP conditions for the operation of NGSO ESOMP in their regulatory framework (eg. Austria³, Bulgaria⁴, Greece⁵, Ireland⁶). Therefore Telesat is of the view that the maximum EIRP for the operation of NGSO ESOMP as established in ECC/DEC/(15)04 should be reflected in the Power/Magnetic field column of the Annex of the Draft Rulebook.</p> <p>3</p> <p>Conclusion</p> <p>To conclude, Telesat would respectfully propose that conditions referring to the operation of NGSO ESOMP should be established according to the CEPT regulatory framework, and in particular according to the ECC/DEC/(15)04.</p> <p>Telesat most welcomes this opportunity to provide comments on the development of the</p>	<p>Коментарот се прифаќа.</p> <p>Согласно Планот за намена на радиофреквенциски опсези на Република Северна Македонија, Препораката ECC Дес / (15)04 за хармонизирано користење, слободен проток и изземање од индивидуално лиценцирање на копнени, мобилни и аеронаутички земски станици на мобилни платформи (ECOMPs) што работат со NGSO FSS сателитски системи во фреквенциските опсези 17.2-20.2GHz 27.5-29.1GHz и 29.5-30.0GHz е усвоена.</p> <p>Техничките параметри и ограничувањата се дадени во Анекс 1 од Препораката ECC Дес / (15)04.</p> <p>Comment accepted. In accordance with Plan for frequency allocation table of the R.N. Macedonia ECC Decision (15)04 for harmonized use, free circulation and exemption from individual licencing of Land, Maritime and</p>

Draft Rulebook in North Macedonia pertaining to the operating conditions of NGSO ESOMP, remains available for possible additional clarifications and looks forward to continuing the discussion and collaboration.

Aeronautical Earth Stations on Mobile Platforms (ESOMPs) operating with NGSO FSS satellite systems in the frequency ranges 17.2-20.2GHz, 27.5-29.1GHz and 29.5-30.0GHz is implemented.

Technical parameters and restrictions are given in Annex 1 **ECC Dec / (15)04**.