

Targeted Consultation on Mobile Satellite Services in the EU 2 GHz MSS frequency band after May 2027

Fields marked with * are mandatory.

1. INTRODUCTION

In 2008, a common EU selection procedure for the use of the 1980-2010 MHz and 2170-2200 MHz frequency bands for Mobile Satellite Services (MSS) ('the EU 2 GHz MSS band') was established by Decision No 626/2008/EC of the European Parliament and of the Council (MSS Decision) to avoid fragmentation of the internal market for MSS and to minimise/prevent the risk of interference between different MSS systems.

On that basis and based on a call for application (OJ C 201/4, 7.8.2008), in 2009, the Commission selected two operators, Inmarsat (now Viasat) and Solaris (now Echostar), to whom all Member States subsequently granted national authorisations for 18 years. These authorisations will expire in May 2027.

In view of the expiry of the rights of use in 2027, the European Commission invited the Radio Spectrum Policy Group (RSPG) to assess different possible scenarios for the use of the frequency bands 1980-2010 MHz and 2170-2200 MHz beyond 2027. The RSPG delivered its opinion (RSPG24-007 FINAL) on 7 February 2024.

In parallel, the Commission contracted a study titled "Study on Mobile satellite services (MSS) in the 2 GHz band in the EU - Implementation of the current regulatory framework and an overview of the satellite connectivity market", with the aim to assess the EU 2 GHz MSS regulatory framework, the deployments in the band by licensees and how Member States have licenced the operators, and to take stock of the current state of play in international satellite markets (study under publication).

In this framework, taking into account the need to ensure predictability and consistency (Article 45(2)) but also effective competition (Article 52) when granting, amending or renew rights of use for radio spectrum, and in line with the considerations set out in Article 50(2) EECC, this consultation will help assess whether full or partial (e.g. for part of the spectrum, or for a shorter period of time) renewal could be justified to avoid severe service disruption and to ensure continuity of band specific services taking into account for instance the return on investments already made or delays in national authorisations for the incumbent operators; or whether, on the contrary, a renewal would limit competition in Mobile Satellite Services provision or stifle future development (of technical or service nature), e.g. excluding other potential stakeholders or usages, or deprive from an opportunity to increase European strategic autonomy and hence a new selection procedure would be necessary.

2. OBJECTIVES OF THE TARGETED CONSULTATION

The current consultation aims to collect information to assess the existence of actual market demand, in the sense of concrete, mature and financed projects, as well as the incumbents' and stakeholders' respective positions helping to define the Commission's next procedural steps in line with the RSPG recommendations. The RSPG recommended, in its Opinion of 7 February 2024, when considering the use of the 2 GHz band after the expiry of the existing rights in May 2027, to take into account the investments and market developments of existing operators as well as the possibility for new entrants to support innovation and offer new services.

The input to this consultation will be considered in order to assess the existence of credible market demand and weigh, in light of Article 50 and recital 129 of the EECC, the competitive impact of renewing the assigned spectrum usage rights against the possible promotion of more efficient exploitation or of innovative new uses that might result if the band were opened to new users. It will also help determine whether to allow only a limited amount of spectrum and/or duration for renewal, in order to prevent severe disruption of established use. It will not be used for assessing admissibility in any future selection procedure.

The common framework of the MSS is a unique case of spectrum selection at EU level. This common framework is necessary, as explained in recital 12 of the MSS Decision, considering that differences in national selection procedures could still create fragmentation of the internal market which would result in a patchwork of successful applicants selected in contradiction to the pan-European nature of those MSS.

Market fragmentation would undermine the single market and create risks of interference between different (satellite) services operating in the band. The RSPG, in its Opinion on the future use of the EU 2 GHz MSS band issued in February 2024, similarly warned against fragmented national authorisation initiatives.

While the rights of use granted in 2009 will expire in 2027, the MSS Decision will remain in force, as its application is not limited in time, and the "common framework for the selection and authorisation of operators of mobile satellite systems" established by this Decision continues to apply (recital 25). Therefore, its provisions establishing a selection procedure are to be applied again when deciding on the use of the 2 GHz band after 2027. The selection criteria set by Article 6(1) of the MSS Decision, and further defined in the call for applications for the selection procedure in 2009([1]), may however need to be further specified, to the extent allowed by the MSS Decision, in order to take into account new developments and trends in MSS networks and services.

The Commission's competence to select MSS operators in the EU 2 GHz MSS band under a common procedure should also include, in line with the general principles of the electronic communications' regulatory framework (in particular Article 50 of the European Electronic Communications Code), the possibility of renewing, in full or in part, the rights of use of the two operators selected on the basis of the MSS Decision.

When assessing the above, account should be taken of the various scenarios examined by the RSPG in its Opinion on MSS.

Moreover, an EU approach should facilitate the development of a competitive internal market for mobile satellite services (MSS) and provide legal certainty for the operation of pan-EU satellite service providers. It should also, to the extent possible, consider the need to ensure service continuity and avoid service

disruption and create opportunities for new satellite technologies and innovative services in the MSS band to boost socio-economic benefits for EU industry and citizens. It should promote digital sovereignty and security and economies of scale for satellite/mobile equipment, in support of the Union's digital autonomy, ensure the most efficient use of radio spectrum in the EU 2 GHz MSS band and contribute to meeting the Union's 2030 Digital Decade targets.

([1]) Official Journal of the European Union C 201 of 7.8.2008, p. 4.

[Call for applications for pan-European systems providing mobile satellite services \(MSS\)](#)

3. LEGAL BASE REFERENCES

MSS Harmonisation Decision

Commission Decision 2007/98/EC of 14 February 2007 on the harmonised use of radio spectrum in the 2 GHz frequency bands for the implementation of systems providing mobile satellite services.

MSS Decision

Decision 626/2008/EC of the European Parliament and of the Council of 30 June 2008 on the selection and authorisation of systems providing mobile satellite services (MSS)

MSS Selection Decision

Commission Decision 2009/449/EC of 13 May 2009 on the selection of operators of pan-European systems providing mobile satellite services (MSS)

MSS Enforcement Decision

Commission Decision of 10 October 2011 on modalities for coordinated application of the rules on enforcement with regard to mobile satellite services (MSS) pursuant to Article 9(3) of Decision No 626/2008 /EC of the European Parliament and of the Council

European Electronic Communications Code

Directive (EU) 2018/1972 of the European Parliament and of the Council of 11 December 2018 establishing the European Electronic Communications Code

4. REPLIES TO THE TARGETED CONSULTATION

This consultation is in English and is open to everybody. It aims to gather the views of a variety of stakeholders who are invited to provide detailed answers by filling out the set of questions in the EU Survey Tool.

Stakeholders include:

- Bodies responsible for electronic communications, including spectrum management and authorisation: local, regional, national and European Union bodies
- Fixed, mobile and satellite services providers
- Users of fixed, mobile and satellite services
- Other organisations than the above, such as academic and research institutions, consumer organisations, international non-governmental organisations, or business associations.

The Commission services welcome comments from all stakeholders until the **30th of June 2025**. You can download the pdf within the EU Survey Tool after clicking on the link above without finalizing your contribution. You can also download below the pdf version.

Please, be aware that responding to the consultation survey is only possible by filling out your answers in the online questionnaire.

The pdf versions are only for information purposes.

For any further questions, you may contact: CNECT-B4@ec.europa.eu .

Please note that replies to the questions will be made public and that the Commission services may not be in a position to respond before the expiry of the above deadline to questions submitted more than 15 days after the launch of this consultation.

Confidentiality

*The Commission may publish the responses received to this consultation. Respondents shall clearly mark which parts of their application they wish to be treated as confidential, marking the relevant parts of their answer as follows: ****CONFIDENTIAL****. The Commission shall treat such applications accordingly. Complete submissions shall in all cases be accessible to other Commission services or any external experts engaged by the Commission for the analysis and/or evaluation of the consultation. Such external experts shall be bound by the confidentiality rules equivalent to those binding Commission officials. Authorised representatives of Member States may be granted access to any information included in the submissions to this consultation. Representatives of Member States are required to respect the confidentiality of such information.*

Following requests from stakeholders, it is now possible to upload files in Question 5 and its sub-questions and in Question 10.

Please be informed that any document you may upload would be considered as annexes to your main answer and should be clearly summarised and referred to in the answers you will submit in the related sub-question box.

Question 1

*You answer as:

- National/Regional Body responsible for electronic communications, including spectrum management and authorisation
- Other local, regional, national authority
- European Union body
- International non-governmental organisation
- Other organisations than the above, such as academic and research institutions
- Consumer organisation
- Fixed services provider
- Mobile services provider

- Satellite services provider
- Business association
- User of fixed, mobile and satellite services
- Private individual
- Other

* Name of your Organisation

Lufthansa Group

* Country of origin

- AF - Afghanistan
- AL - Albania
- DZ - Algeria
- AD - Andorra
- AO - Angola
- AG - Antigua and Barbuda
- AR - Argentina
- AM - Armenia
- AU - Australia
- AT - Austria
- AZ - Azerbaijan
- BS - Bahamas
- BH - Bahrain
- BD - Bangladesh
- BB - Barbados
- BY - Belarus
- BE - Belgium
- BZ - Belize
- BJ - Benin
- BT - Bhutan
- BO - Bolivia
- BA - Bosnia and Herzegovina
- BW - Botswana
- BR - Brazil
- BN - Brunei Darussalam

- Ⓒ BG - Bulgaria
- Ⓒ BF - Burkina Faso
- Ⓒ BI - Burundi
- Ⓒ CV - Cabo Verde
- Ⓒ KH - Cambodia
- Ⓒ CM - Cameroon
- Ⓒ CA - Canada
- Ⓒ CF - Central African Republic
- Ⓒ TD - Chad
- Ⓒ CL - Chile
- Ⓒ CN - China
- Ⓒ CO - Colombia
- Ⓒ KM - Comoros
- Ⓒ CG - Congo
- Ⓒ CR - Costa Rica
- Ⓒ CI - Côte D'Ivoire
- Ⓒ HR - Croatia
- Ⓒ CU - Cuba
- Ⓒ CY - Cyprus
- Ⓒ CZ - Czechia
- Ⓒ CD - Democratic Republic of the Congo
- Ⓒ DK - Denmark
- Ⓒ DJ - Djibouti
- Ⓒ DM - Dominica
- Ⓒ DO - Dominican Republic
- Ⓒ EC - Ecuador
- Ⓒ EG - Egypt
- Ⓒ SV - El Salvador
- Ⓒ GQ - Equatorial Guinea
- Ⓒ ER - Eritrea
- Ⓒ EE - Estonia
- Ⓒ SZ - Eswatini
- Ⓒ ET - Ethiopia
- Ⓒ FJ - Fiji

- FI - Finland
- FR - France
- GA - Gabon
- GM - Gambia
- GE - Georgia
- DE - Germany
- GH - Ghana
- GR - Greece
- GD - Grenada
- GT - Guatemala
- GN - Guinea
- GW - Guinea Bissau
- GY - Guyana
- HT - Haiti
- HN - Honduras
- HU - Hungary
- IS - Iceland
- IN - India
- ID - Indonesia
- IR - Iran
- IQ - Iraq
- IE - Ireland
- IL - Israel
- IT - Italy
- JM - Jamaica
- JP - Japan
- JO - Jordan
- KZ - Kazakhstan
- KE - Kenya
- KI - Kiribati
- KW - Kuwait
- KG - Kyrgyzstan
- LA - Laos
- LV - Latvia

- LB - Lebanon
- LS - Lesotho
- LR - Liberia
- LY - Libya
- LI - Liechtenstein
- LT - Lithuania
- LU - Luxembourg
- MG - Madagascar
- MW - Malawi
- MY - Malaysia
- MV - Maldives
- ML - Mali
- MT - Malta
- MH - Marshall Islands
- MR - Mauritania
- MU - Mauritius
- MX - Mexico
- FM - Micronesia
- MC - Monaco
- MN - Mongolia
- ME - Montenegro
- MA - Morocco
- MZ - Mozambique
- MM - Myanmar
- NA - Namibia
- NR - Nauru
- NP - Nepal
- NL - Netherlands
- NZ - New Zealand
- NI - Nicaragua
- NE - Niger
- NG - Nigeria
- KP - North Korea
- MK - North Macedonia

- Ⓐ NO - Norway
- Ⓐ OM - Oman
- Ⓐ PK - Pakistan
- Ⓐ PW - Palau
- Ⓐ PA - Panama
- Ⓐ PG - Papua New Guinea
- Ⓐ PY - Paraguay
- Ⓐ PE - Peru
- Ⓐ PH - Philippines
- Ⓐ PL - Poland
- Ⓐ PT - Portugal
- Ⓐ QA - Qatar
- Ⓐ MD - Republic of Moldova
- Ⓐ RO - Romania
- Ⓐ RU - Russian Federation
- Ⓐ RW - Rwanda
- Ⓐ KN - Saint Kitts and Nevis
- Ⓐ LC - Saint Lucia
- Ⓐ VC - Saint Vincent and the Grenadines
- Ⓐ WS - Samoa
- Ⓐ SM - San Marino
- Ⓐ ST - Sao Tome and Principe
- Ⓐ SA - Saudi Arabia
- Ⓐ SN - Senegal
- Ⓐ RS - Serbia
- Ⓐ SC - Seychelles
- Ⓐ SL - Sierra Leone
- Ⓐ SG - Singapore
- Ⓐ SK - Slovakia
- Ⓐ SI - Slovenia
- Ⓐ SB - Solomon Islands
- Ⓐ SO - Somalia
- Ⓐ ZA - South Africa
- Ⓐ KR - South Korea

- SS - South Sudan
- ES - Spain
- LK - Sri Lanka
- SD - Sudan
- SR - Suriname
- SE - Sweden
- CH - Switzerland
- SY - Syrian Arab Republic
- TJ - Tajikistan
- TZ - Tanzania
- TH - Thailand
- TL - Timor-Leste
- TG - Togo
- TO - Tonga
- TT - Trinidad and Tobago
- TN - Tunisia
- TR - Türkiye
- TM - Turkmenistan
- TV - Tuvalu
- UG - Uganda
- UA - Ukraine
- AE - United Arab Emirates
- GB - United Kingdom
- US - United States of America
- UY - Uruguay
- UZ - Uzbekistan
- VU - Vanuatu
- VE - Venezuela
- VN - Viet Nam
- YE - Yemen
- ZM - Zambia
- ZW - Zimbabwe

I agree with the personal data protection provisions

[Targeted consultations MSS privacy notice 27 05 clean.docx](#)

Question 2

What types of mobile satellite services should be provided in the EU 2 GHz MSS band and what added value / benefits would these services provide in the future for EU businesses and/or citizens?

- Lufthansa Group (here representing Lufthansa German Airlines (Germany), Lufthansa City Airlines (Germany), Austrian Airlines (Austria), Air Dolomiti (Italy), SWISS International Air Lines (Switzerland)) welcomes the opportunity to comment on the European Commission's public consultation "Targeted Consultation on Mobile Satellite Services in the EU 2 GHz MSS frequency band after May 2027" on the use of frequency bands 1980 - 2010 MHz and 2170 - 2200 MHz for Mobile Satellite Service (MSS), from 2027.

- Lufthansa Group in total transported over a 100mn passengers in Europe in 2024. Lufthansa Group in total has 500+ narrowbody aircraft in operation in Europe.

- For Lufthansa Group it is essential that the EAN can continue to access 2 x 15 MHz post 2027, i.e., 1980-1995 MHz and 2170-2185 MHz. The EAN is a critical building block in continuing to offer an industry-leading connectivity solution to our passengers. The EAN allows us to drive engagement with our customers, develop new revenue streams, improve flight planning, and make us more competitive. Providing in-flight connectivity for our passengers means enabling customers with the best service possible. Doing so in a market where many competitors provide free connectivity to either their higher-tier or all of their passengers becomes a commercial necessity for many airlines. We at Lufthansa Group, much like Viasat, Deutsche Telekom and others in the EAN value chain, have collectively invested almost half a billion Euros into making the EAN a reality on more than 150 Lufthansa Group aircraft (to be EAN equipped until early 2027 with the first ones already flying). These aircraft form part of currently more than 350 aircraft – including non-Lufthansa Group ones – live on the EAN, with more than 600 committed by the end of 2026 according to Viasat source.

- We have built internal programs and external, passenger-facing value propositions based on the continued availability to this service. We will be serving millions of customers each year, and with new product offerings offering more services for free to our customers, we expect the demand and uptake to increase significantly.

- Lufthansa Group has chosen the EAN, as, because of its ultra small size and low weight, it is optimised for European flights and delivers low latency and high bandwidth. Its size benefits result in lower costs, both one off and lifetime, swifter installation, better environmental performance and better passenger experience. It is also a critical building block towards a more connected aircraft and Lufthansa Group airlines using connectivity for operational purposes. This will, for example, allow ad hoc flight route optimization avoiding fuel consuming non-optimized detours under severe weather conditions.

- We, Lufthansa Group, expect the demand and use for the EAN to increase substantially over the next years, as our product innovation drives uptake rates. To accommodate this growth the EAN needs to be able to continue to have access to 2 x 15 MHz post 2027 in order to best serve our aircraft over the EU and Europe more broadly.

Please provide your views for the short (up to 2032), and long term (up to 2045).

Question 3

What sharing opportunities/scenarios (if any) do you envisage or consider possible in the EU 2 GHz MSS band? What are the main challenges and enablers for their implementation and how would they ensure efficient spectrum use in all EU countries?

[not answered by Lufthansa Group]

Question 4

Currently Article 4(1)(b) of the MSS Decision sets a maximum 2x15 MHz per single applicant, what is your view or preference regarding the future structure of the satellite market based on the use of the EU 2 GHz MSS band? How should this be reflected in any band segmentation in the future?

- For Lufthansa Group it is essential that the EAN can continue to access 2 x 15 MHz post 2027. The EAN is a critical building block in continuing to offer an industry-leading connectivity solution to our passengers. The EAN allows us to drive engagement with our customers and develop new revenue streams. Providing in-flight connectivity for our passengers, means enabling customers with the best service possible.
- We, Lufthansa Group, in the name of our millions of passengers each year, who rely on us to provide them with access to connectivity to work and stay in contact with friends and family, favour any option which includes 2x15 MHz for the EAN.
- The EAN service is the first truly pan-European service. Any decision the European Commission takes needs to ensure that it is harmonised with all other European countries our aircraft fly to on a weekly, if not daily basis. A change in the spectrum allocation for the EAN in the EU vis-à-vis the wider European countries could significantly impact the EAN's ability to provide continuous connectivity. Having to operate in a Europe where different amounts of spectrum are held could impact the overall IFC experience significantly and therefore frustrate users.

In answering this question, you could make reference to at least one of the band segmentation options below but also suggest (an) additional one(s):

Option A: Operator 1 = 2x15 MHz - Operator 2 = 2x15 MHz

Option B: Operator 1 = 2x10 MHz - Operator 2 = 2x10 MHz - Operator 3 = 2x10 MHz

Option C: Operator 1 = 2x15 MHz - Operator 2 = 2x10 MHz - Operator 3 = 2x5 MHz

Option D: Operator 1 = 2x15 MHz - Operator 2 = 2x10 MHz – Shared pool = 2x5 MHz

In case you address band segmentation option d. (or propose another one with a 'shared pool') please elaborate your view on the structure and management (possibly also further aspects) of such a 'shared 'pool'.

[not answered by Lufthansa Group]

Question 5

For satellite operators that either already provide or are interested in providing services in the EU 2 GHz MSS band:

What are your concrete and detailed service plans for the future use of the EU 2 GHz MSS band after 2027, both in the short (e.g. up to 2032) and in the long-term (up to 2045)?

[not answered by Lufthansa Group]

Please include complete information and justification, addressing among others:

a. Business plan: use cases, service portfolio and evolution, evidence of market demand, number of end-users served or projected and the description of the MSS service portfolio (voice, data, IoT etc)

[not answered by Lufthansa Group]

Please upload your file(s)

b. Projections of service-specific and aggregate data payload over short-term (up to 2032) and long-term (up to 2045), EU-wide coverage, minimum coverage need for satellite usage, maximum required spectrum bandwidth per service and overall, efficient spectrum use based on used technology and/or sharing (or other) arrangements; expected average/peak throughput.

[not answered by Lufthansa Group]

Please upload your file(s)

c. Any detailed description of the satellite network (including Network Operations Centre (NOC) location, gateway location, satellites used, Complementary Ground Components etc.), its status of filing (including notifying administration), deployment and life span, as well as its impact in terms of spectrum coexistence on other existing or potential new systems within the band. More specifically, please describe any possible impacts that would arise from the ITU-R orbital/ frequency rights held by existing licensees Viasat or Echostar and how do you plan to overcome them? Please elaborate your view

[not answered by Lufthansa Group]

Please upload your file(s)

d. Any schedule of service deployment, coverage and availability, including schedule regarding mature development and/or availability and type of equipment and end-user terminals intended to be used under your business case per application

[not answered by Lufthansa Group]

Please upload your file(s)

e. All admissibility requirements set out in Article 4(1) of the MSS Decision

[not answered by Lufthansa Group]

Please upload your file(s)

f. Any alternative frequency range(s) (including for MSS or terrestrial IMT), which can be used instead of or in addition to the EU 2 GHz MSS band

[not answered by Lufthansa Group]

Please upload your file(s)

g. Additional relevant information

[not answered by Lufthansa Group]

Please upload your file(s)

In general, please provide all relevant information, which will allow assessing the credibility and the level of maturity of your plans, and your capacity to meet the regulatory requirements of the MSS Decision or which will allow to assess the contribution of your project to public policy objectives, such as the ones included in Article 6 of the MSS Decision. Incumbent operators replying to this consultation should provide in the context of points a.-e. above, in addition to the information on investments already made for the use of this band (distinguishing common costs for investments which are also used with other bands) and their related amortisation, relevant data as regards their business plans for developing the satellite network, the evolution of existing and the provision of future services and their respective current and projected data payload, channel occupancy and

spectrum need, both in the short-term (until 2032), and in the long-term (at least until 2045), the current and future use of the most spectrum-efficient technology and any other relevant conditions supporting efficient spectrum use (such as any sharing or wholesale arrangements). They should provide information on the existing clients/users per Member State (including their number), as well as the kind of services they or their clients are offering to retail end-users as well as the end-users served (if possible per Member State), etc. Incumbent operators should also provide information as to whether there were delays in the deployment of services from 2009 and provide the reasons for such delays

[not answered by Lufthansa Group]

Question 6

What would be in your view the best way to ensure the continuity of services which are currently provided in the EU 2 GHz MSS band ('incumbent services') by existing or new operators?

a. In the case where any incumbent service is specific to the EU 2 GHz MSS band and cannot be migrated to another band without incurring disproportionate costs, would you consider a full or a partial renewal to be justified?

- We, Lufthansa Group, consider a full renewal to be justified.
- We, Lufthansa Group, understand that Viasat's satellite, ground infrastructure and terminal equipment, with which they provide the EAN service, is all tuned to the 2 GHz MSS frequency. It cannot operate in another frequency.
- From our perspective it would take, at a minimum, one year to complete a selection process for another vendor for any EAN replacement. Unbuilding the EAN, and replacing it with competitor technology on each and every former EAN equipped aircraft, would take between two and three years. This assumes that sufficient hangar capacity to then retrofit around 150 Lufthansa Group aircraft during winter season is available. This would either drive up prices or increase the wait times for a retrofit. In any event, having to change suppliers will significantly affect our margins. Given the strong competition in Europe, such a loss could also severely affect our competitiveness vis-à-vis other non-European airlines, e.g., from the Middle East.
- This would mean that the tens of millions of passengers per year will not be able to connect in the sky. At a time when IFC is a critical competitive advantage, not being able to provide any service risks driving customers away and affecting our revenue.
- Additionally, any positive impact from being able to use the EAN to improve our operations as well as our CO2-footprint might not be realisable or at least would be significantly delayed.
- We expect the costs of having to retender, and to re-equip our currently EAN-equipped fleet, to be in the high double-digit millions. This does not include any potential reputational damage or loss of revenue from being unable to provide IFC for a number of years on those aircraft.

- Additionally, any award at this late stage prior to May 2027 risks leaving spectrum unused for a considerable time until it could be used by one (or more) new awardee(s) from what we understand.

b. If so, please specify the amount of spectrum needed and the proposed duration of the renewed rights.

- For Lufthansa Group it is essential that the EAN can continue to access 2 x 15 MHz post 2027. The EAN is a critical building block in continuing our journey to offer an industry-leading connectivity solution to our passengers.

- In order to avoid the current and persistently strong regulatory uncertainty which the European Commission process has brought about, we consider a full renewal necessary. As an airline we value a planning horizon upwards of 10 years for significant investments such as an inflight connectivity vendor. Therefore, having regulatory certainty of a full renewal will further allow us to invest in our EAN-enabled products and services for passengers and our own operations.

c. For satellite operators that already provide services in the EU 2 GHz MSS band: what is the estimated number or scope of potential users that would be impacted by a disruption or discontinuity of services?

[not answered by Lufthansa Group]

d. To support an assessment of whether any of the existing rights of use should be partially or fully renewed, and in accordance with Article 50(2) of the EECC, please indicate under which conditions you would consider that:

- the objectives of Articles 3, 45(2) and 48(2) of the EECC and of Article 1 of the MSS decision are fulfilled;
- the harmonised technical requirements of the MSS Harmonisation Decision for the efficient use of the 2 GHz band are complied with;
- the conditions of Article 7 of the MSS Decision are implemented;
- there is sufficient competition in line with Article 52 of the EECC;
- there is need to render the use of radio spectrum more efficient in light of technological or market evolution;
- there is a need to avoid severe service disruption.

[not answered by Lufthansa Group]

Question 7

In the event of a full or partial renewal of licenses, would you consider that there is a need to review the conditions attached to the authorisations or to render the use

of radio spectrum more efficient in light of technological or market evolution? If so, in which direction should such a review be undertaken? What measures could be taken to promote fair competition and avoid market distortion?

[not answered by Lufthansa Group]

Question 8

In your view, should the selection criteria set out in Article 6(1) of the MSS Decision be further specified, in order to better reflect state-of-the-art satellite technologies /services and contemporary EU-level public policy objectives?

[not answered by Lufthansa Group]

Would you have any concrete proposals how to further specify the weighted selection criteria set out in Article 6(1) and summarised below, in order to reflect technological and service evolution and contemporary EU-level policies:

- Consumer and competitive benefits provided (20% weighting), referring in particular to the number of end-users and the range of services provided by the date of start of a continuous commercial MSS service, and the starting date of a continuous commercial MSS service:

[not answered by Lufthansa Group]

- Spectrum efficiency (20% weighting), referring in particular to the total amount of spectrum required and the aggregated data stream capacity:

[not answered by Lufthansa Group]

- Pan-EU geographic coverage (40% weighting), referring in particular to the number of Member States and population, the degree of geographical coverage, and the time to reach a degree of service availability in all Member States (coverage of 50% of population and 60% of the aggregate territory):

[not answered by Lufthansa Group]

- The extent of other public policy objectives (20% weighting), referring in particular to the provision of public interest services, the integrity and security of the services, and the range of services in rural or remote areas:

[not answered by Lufthansa Group]

The proposals should include (but not be limited to) specification of various terms or parameters referred to in Article 6(1) (e.g. ‘end-users’, ‘aggregated data stream capacity’ or ‘service security’) and take into account different satellite constellations (e.g. GEO, LEO, hybrid etc), different business models, such as wholesale and retail models, or technologies (e.g. 3GPP-based). The respondents are invited to consult the 2008 Call for application for an example of how the criteria of Article 6 could be further elaborated in practice

[not answered by Lufthansa Group]

Question 9

Do you see any need to apply spectrum management conditions, in order to optimise interference mitigation between different operators and thus ensure more efficient spectrum use (e.g. limiting technology neutrality by giving preference to (a) particular type(s) of technology in the EU 2 GHz MSS band)?

If so, please explain why and what would be your preferred spectrum management solution?

[not answered by Lufthansa Group]

Question 10

Please provide any other information you consider relevant in the context of this consultation.

[not answered by Lufthansa Group]

Please upload your file(s)

Contact

CNECT-B4@ec.europa.eu

