

From: [Salter, Robert \(WFF-820.0\)\[ORBITAL SCIENCES CORPORATION\]](#)
To: [Radio Spectrum](#)
Subject: 1710-2300 MHz Discussion document
Date: Friday, 29 May 2020 2:11:18 a.m.

Sirs:

As a stakeholder (licensee #521572 – Columbia Scientific Balloon Facility) and current license holder of spectrum in the affected bands (#265508), CSBF would like to comment on the proposal. Specifically questions 8-11 in regard to space operations.

Question 8: Do you agree with RSM’s proposal to reserve 2081.5-2110 MHz and 2256.5-2290 MHz exclusively for space operation in New Zealand? If not, why not?

CSBF concurs with the recommendation.

Question 9: Do you agree that the reserved spectrum would be adequate to support the growing demand in space activities?

For CSBF application in this band (as listed in license #265508), we agree that the reserved band will support CSBF Balloon-to-Space NASA TDRS operations in lower S.

Question 10: Is there a better use for the spectrum between 2081.5-2110 MHz and 2256.5-2290 MHz? If so, what?

CSBF requests that MBIE follow ITU guidelines for this band, and will work with other stakeholders to ensure shared access as necessary.

Question 11: Do you agree with the proposal to use 10 MHz guard bands in the frequency range 2290-2300 MHz?

CSBF notes that our current license (#265508) has an emission bandwidth of 6Mhz. At our operating frequency (defined by the receiver on the satellite and unchangeable on our transmitting equipment) we will encroach on the guard band. We request case-by-case review for any licenses granted or reviewed.

Thank you very much for the opportunity to comment on this spectrum allocation. CSBF looks forward to being a responsible user of spectrum in New Zealand.

Regards

R.

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