



EVANGELICAL LUTHERAN CHURCH OF PAPUA NEW GUINEA

Lutheran ICT & Communications



Lae, 07.09.2023

Rev. Dr. Jack Urame, Head Bishop

To:
Mr. Gibson Tito
Manager Licensing & Business Relations
NICTA
PO Box 8227, Boroko 111
National Capital District
Papua New Guinea

Subject: Submission on LEO Satellite Services Discussion Paper

Dear Mr. Tito,

We are reaching out in response to NICTA's Discussion Paper on LEO Satellite Services. ELCPNG is keen on utilising emerging communication technologies in the coming years, especially to enhance communication and remote education opportunities for our rural congregations, schools, health facilities and communities.

Question 1:

- (a) We advocate for the licensing of LEO satellite service providers by NICTA, aligning with global standards and ensuring adherence to national regulations.
- (b) An exemption from the Act could be considered for providers offering specialized, non-commercial services with limited impact on the general consumer base.
- (c) Temporary exemptions might be appropriate during national emergencies to swiftly address the communication needs of affected regions.

Question 2:

We concur with NICTA's evaluation of the existing terms and conditions.

Question 3:

We support the proposed addition of a specific section in the 2011 Rule for clarity on LEO satellite services. However, we express reservations about Paragraph 4's network availability requirement of 99.54%. The cited source seems more applicable to GEO than LEO services. We suggest a thorough review of Schedule 3a to ensure it aligns with LEO capabilities, as demonstrated by providers like Starlink or Lynk.

Question 4:

We respectfully oppose the geofencing of LEO services to undersupplied areas in PNG due to:

- a) *Technical Challenges:* Geofencing conflicts with LEO's global coverage design.
- b) *Provider Limitations:* Such restrictions could impede LEO service providers' operations.
- c) *Administrative Burden:* Continuously identifying undersupplied areas would add administrative complexity and slow LEO service deployment.

In essence, PNG would benefit more from unrestricted access to LEO services, ensuring wider coverage and swift deployment.

Question 5:

While managing LEO services exclusively through the UAS Scheme might introduce administrative complexities, we strongly endorse their eligibility for inclusion in the UAS. This could incentivize providers to boost LEO accessibility in rural regions.

We applaud NICTA for spearheading this public consultation, ensuring a robust regulatory framework for LEO satellite services that meets PNG's requirements.

Thank you for your attention to our feedback.

In His Service,



Bernad Kaisom
General Secretary ELCPNG



Thorsten Krafft
Advisor Lutheran ICT & Communications

