

TE (PNG) LIMITED – LEO CONSULTATION

Question 1:

(a) Do you agree that providers of LEO satellite services in PNG should be licensed by NICTA under the Act, as other providers of network services are licensed?

Yes, I agree that providers of LEO satellite services in PNG should be licensed by NICTA under the Act. This is because LEO satellite services are a type of network service, and all network services in PNG are required to be licensed by NICTA. Licensing ensures that providers of LEO satellite services meet certain standards and requirements, such as having the necessary technical expertise and financial resources to provide reliable and affordable services. It also helps to protect consumers from unscrupulous providers.

(b) If not, what other authorisation arrangements, if any, should apply?

If LEO satellite services are not required to be licensed by NICTA, then I believe that some other form of authorization should be required. This could be a registration process, or a certification process. Registration would simply require providers of LEO satellite services to provide certain information to NICTA, such as their contact details and the services they offer. Certification would require providers of LEO satellite services to meet certain standards, such as having the necessary technical expertise and financial resources.

(c) Would any form of exemption be appropriate, and under what circumstances?

I believe that exemptions from licensing or other authorization requirements could be appropriate in some cases. For example, an exemption could be granted to a small, local provider of LEO satellite services that does not pose a significant risk to consumers. Another example would be an exemption for a provider of LEO satellite services that is providing services to a government agency or other public body.

Question 2:

Do you agree with NICTA's assessment of the current terms and conditions of individual network licences which should apply to the provision of LEO satellite services? If not, what alternative arrangements should apply?

I agree with NICTA's assessment of the current terms and conditions of individual network licences which should apply to the provision of LEO satellite services. These terms and conditions are designed to ensure that providers of LEO satellite services meet certain standards and requirements, such as having the necessary technical expertise and financial resources to provide reliable and affordable services. They also help to protect consumers from unscrupulous providers.

Here are some of the key terms and conditions of individual network licences for LEO satellite services:

The provider must have the necessary technical expertise to operate a LEO satellite network.
The provider must have the financial resources to provide reliable and affordable services.
The provider must comply with all applicable laws and regulations.
The provider must protect the privacy of its customers.
The provider must provide customer support.

I believe that these terms and conditions are fair and reasonable, and that they are necessary to protect consumers and ensure the quality of LEO satellite services.

Alternative arrangements:

If I were to suggest alternative arrangements, I would say that NICTA could:

Increase the frequency of inspections of LEO satellite networks to ensure that providers are complying with the terms and conditions of their licences.

Work with other regulators in the region to share information about LEO satellite providers and to coordinate enforcement actions.

Develop a code of conduct for LEO satellite providers that sets out clear expectations for their behavior.

Create a public awareness campaign to educate consumers about the risks of using unlicensed LEO satellite services.

I believe that these measures would help to ensure that the terms and conditions of individual network licences are enforced and that consumers are protected from unscrupulous providers.

Question 3:

Do you agree with the addition of a specific section in the 2011 Rule to clarify the terms and conditions of licence where an individual network licensee chooses to provide LEO satellite services, as set out in Attachment 1 to the Discussion Paper? If not, what changes would you recommend?

I agree with the addition of a specific section in the 2011 Rule to clarify the terms and conditions of licence where an individual network licensee chooses to provide LEO satellite services. The attachment provides clear and concise requirements for network licensees who provide public cellular mobile services and other public network services using LEO satellite networks. These requirements are necessary to ensure that these services are reliable and meet the needs of consumers.

Changes I would recommend:

I would recommend two changes to the attachment:

I would add a requirement for the licensee to provide customer support. This is important to ensure that consumers can get help if they have problems with the service.

I would also add a requirement for the licensee to disclose the latency of the LEO satellite network. This is important for consumers to know how long it will take for their data to travel to and from the network.

I believe that these changes would make the attachment more comprehensive and would help to protect consumers.

Overall, I believe that the attachment is a good starting point for clarifying the terms and conditions of licence for network licensees who provide public cellular mobile services and other public network services using LEO satellite networks. I would recommend making the two changes I mentioned above, but I believe that the attachment is otherwise a good piece of work.

Question 4:

Do you agree that the LEO services should be permitted in locations and or areas designated by NICTA where telecommunications services are not existent and or are inadequate?

Yes, I agree that LEO services should be permitted in locations and or areas designated by NICTA where telecommunications services are not existent and or are inadequate. LEO satellites offer a number of advantages over traditional terrestrial telecommunications networks, such as:

They can provide coverage to remote and rural areas that are not served by traditional networks.
They can offer high-speed broadband internet access, even in areas with limited infrastructure.
They are more resilient to natural disasters than traditional networks.
Allowing LEO services in these areas would help to bridge the digital divide and provide much-needed telecommunications services to people who would otherwise not have access to them.
Kind regards,

Robbie Huxley
Managing Director