



March 19, 2008

Mr. Mark Thomas  
Director, European Radiocommunications Office  
Nansensgade 19, 3  
DK-1366 Copenhagen K  
Denmark

Your ref: 8-782/SHA (4.6.4.2)

Dear Mr. Thomas,

### **PUBLIC CONSULTATION ON THE FUTURE ROLE OF CEPT**

The Mobile Satellite Users Association (MSUA) greatly appreciates its current involvement in CEPT, based on its Letter of Understanding (LoU) signed in 2005, and welcomes the opportunity to respond to the consultation on 'The Future Role of CEPT'. Although we do not feel able to comment in detail on the specific questions raised in the consultation, MSUA wishes to highlight three broad points of principle, which have been agreed by the MSUA Board.

- (1) There should be provision for industry participation under appropriate conditions. We believe that the increased industry participation in CEPT project teams and working groups in recent years has greatly benefitted the CEPT decision-making processes. In our view this participation should be further encouraged, for example by greater participation of industry technical experts on national delegations at working groups and the ECC. We also believe that the LoU procedure has benefitted CEPT by allowing increased industry-wide participation in these fora.
- (2) CEPT Decisions, Recommendations and Reports are important and should be maintained. Moreover, they can confer a regulatory advantage to industry members who work with emerging technologies. As a result, States both within the CEPT geography - as well as those without - are supported through capacity building, with the resultant contribution towards reducing the digital divide. However, CEPT outputs, to be of value, must be implemented by national governments. CEPT, by drawing on its expertise, should provide more assistance to support member states in implementing policy outcomes.
- (3) In a competitive market, economics will invariably figure into considerations of spectrum management and policy. However, these should not be an overriding consideration for the CEPT. Rather, the CEPT should endeavor to strike a balance between the need to ensure optimal spectrum management practices and the efficient allocation of spectrum. This means that it must retain its focus on technical analysis, while giving appropriate weight to the importance of certain services over the simple revenue they will generate.

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MSUA believes that any reform of CEPT needs to address these principles in order to maintain its standing as a leading authority on radio communications management and regulation. We look forward to continuing to work with CEPT in the future.

Please contact the undersigned with any questions regarding this matter.

Respectfully submitted,

A handwritten signature in black ink that reads "Tim Farrar". The signature is written in a cursive style with a long, sweeping tail on the final letter.

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