



Mr Yoav Harel  
Regulatory Manager  
Communications Commission  
Ground Floor, Murray House  
Mount Havelock, Douglas  
Isle of Man  
IM1 2SF

1<sup>st</sup> of October, 2015

**Subject: Consultation on the Licensing of Satellite Earth Stations**

Dear Mr. Harel:

SES Satellite Leasing Limited (SESSL), a wholly-owned subsidiary of SES S.A. of Luxembourg (see Attachment 1 for further information), the world's largest satellite operator, welcomes the Communications Commission's (the "Commission") Consultation on the Licensing of Satellite Earth Stations and related Modification of a Telecommunications Act Licence (the Consultation). SESSL engages in commercial and technical aspects of the core SES business. It is an integral part of SES. With more nearly a decade long presence in the Isle of Man, SESSL has plans to continue to expand its commercial presence and to invest in the Isle of Man. This expansion plan includes the installation of a teleport with Earth Stations.

For the Isle of Man to encourage SESSL and other operators to proceed with such development requires a transparent, flexible, efficient and reliable regulatory framework. Based on established Ofcom procedures SESSL has to date anticipated such transparent and efficient regulatory implementation. We address, in confidence, the Commission's proposals below.

SESSL would like to emphasize the need for the Isle of Man to compete with other jurisdictions to attract new business and development. Accordingly, the Commission must use great care to avoid implementation of a licensing and fee structure which has the effect of discouraging economic development and does not, as a result, serve the social interest. In the end, the proposed overly zealous fee structure will result in the opposite of the Commission's intent. Rather than encouraging investment in and generating revenue for the Isle of Man, it would force potential investors and licensees away to other jurisdictions.

As currently planned, SESSL's teleport would contribute to the island and contribute to a growing job base. If the Commission's structure as proposed is

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implemented, SESSL will have to re-evaluate its plans. SESSL urges an Isle of Man process and fee structure which, particularly when combined with those also imposed by Ofcom that is as lean as possible. In particular, SESSL urges avoiding bureaucratic and costly revenue based fee structures or requests for sensitive, confidential company business data.

Also, the significant investment for an Isle of Man Earth Station and the lifetime of such high tech infrastructure should match the useful life of a typical GEO satellite (typically at least fifteen (15) years but often more) should be reflected in the Earth Station licence term.

Please find attached SESSL's comments in more, private & confidential detail, providing some input to the Consultation.

Yours sincerely,



11/10/2015

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