AP 20201229: Comments on Draft ETSI EN 303 413 V1.2.0
Satellite Earth Stations and Systems (SES);
Global Navigation Satellite System (GNSS) receivers;
Radio equipment operating in the 1 164 MHz to 1 300 MHz
and 1 559 MHz to 1 610 MHz frequency bands;
Harmonised Standard for access to radio spectrum
SES SCN

Note to TBs:
Please identify for each comment whether it has been **Noted**, **Accepted**, **Accepted with modifications** or **Rejected** and, for Technical Comments, give some short explanation.

NSO	**Clause/ Sub-Clause**	**Paragraph Figure/ Table**	**Type of comment** (Technical[(1)] or Non-Technical)	**COMMENTS**	**Proposed change**	**OBSERVATIONS** on each comment submitted

NO-01	**5, F3**		**Technical**	It is important to remember that the harmonised standards are produced not only for a manufacturer's verification of a design. These documents can be very useful for market surveillance authorities as they represent a technical framework that market surveillance authorities may use in a legal context with low risk of disputes. The test method is part of the equation and hence a test method and limit in a HS may be appropriate to reduce the risk of disputes related to the selected test method and limit even if the manufacturer initially thinks that the limit might be obvious. If the manufacturers don't want to be part of specifying a test method and a corresponding limit associated with all relevant parameters, they leave the floor open for other stakeholders to specify such provisions.	More tests should be defined to give guidance to the market surveillance authorities regarding the acceptable values of the various parameters.	

NO-02	**5, F3**		**Technical**	According to the **ETSI guide EG 203 336 V1.2.1 (2020-05)** clause 5.3.2 a Harmonised Standard (HS) should include requirements for **receiver sensitivity**. A HS should include a test even for minimum in band receiver sensitivity requirements, preferably including antenna performance, since it should not be necessary for the market surveillance authorities to decide the appropriate boundaries for the acceptable level of receiver sensitivity when doing market surveillance. In other words we consider this to be a parameter that is appropriate in this case even if it is lacking in the current draft.	We would like testing of **in band receiver sensitivity** to be included in the document	
NO-03	**5, F6**		**Technical**	According to the **ETSI guide EG 203 336 V1.2.1 (2020-05)** clause 5.3.6.1 a Harmonised Standard (HS) should include requirements for **dynamic range**. Good receiver dynamic range can be helpful when it comes to resilience against jamming attempts and noise from other poorly designed equipment. A HS should include a test for receiver dynamic range requirements since it should not be necessary for the market surveillance authorities to decide the appropriate boundaries for the acceptable level of dynamic range when doing market surveillance. In other words we consider this to be a parameter that is appropriate in this case even if it is lacking in the current draft.	We would like testing of **dynamic range** to be included in the document	

[1]**Technical Comment:** a comment which proposes a technical change in an ETSI deliverable. A technical change is one which, implicitly or explicitly, adds, removes or modifies provisions of the deliverable.

NOTE: Technical changes can result in modified behavior of equipment or systems designed to be conformant to that deliverable.