

The FCS represents companies which provide professional communications solutions to business users. Our members deliver telecommunications services via mobile and fixed line telephony networks, broadband, satellite, wi-fi and business radio. Our members' customers range from SMEs, home-workers and micro-businesses up to the very largest private enterprises and public sector users. The FCS is the largest trade organisation in the professional communications arena, representing the interests of circa 350 businesses which supply B2B services nationwide.

Given the membership of the FCS, which is mainly smaller CPs/resellers, we haven't responded to the detailed questions in the consultation but would like to make a couple of general policy points for you to consider.

The FCS agrees that Satellite technology is playing an increasingly important role in communication solutions and that there is a growing demand for spectrum to support satellite networks.

The FCS broadly supports Ofcom's work in this area and its aim to increase available spectrum to Earth Stations in Motion (ESIMs). However, we are increasingly concerned that access to satellite technology is limited and without regulatory safeguards in this increasingly important area, competition will be suppressed and customers harmed. We urge Ofcom to consider wholesale access obligations to ensure that the wider telecoms supply chain can access satellite services.

FCS members are reporting difficulties in gaining access to satellite products and services, particularly in rural areas. It is important that Ofcom does not allow large tech companies to create monopolies that harm customers. There have been a number of recent consultations covering satellite technology and we believe that now is the time for Ofcom to undertake a more comprehensive review of the competition aspects of the satellite market and to ensure that there are requirements to wholesale products and services in a way that smaller CPs/resellers can compete.