Consultation response form

Question	Your response
Question 1: Do you agree with our proposal to make spectrum available for aeronautical and maritime ESIMs connecting with GSO satellites in 12.75-13.25 GHz, in line with the ITU framework?	Confidential? –N Yes. Telenor Maritime supports making 12.75-13.25 GHz available for aeronautical and maritime ESIMs connecting with GSO satellites, in line with the ITU framework. International alignment is important for maritime operations, because vessels operate across jurisdictions and require predictable and harmonised spectrum access conditions. The additional Ku-band spectrum can contribute to improved capacity, resilience and service continuity for customers and crew. For maritime operations, Telenor Maritime encourages Ofcom to provide clear practical guidance on the 158 km separation requirement, the meaning and process for "prior agreement" by a coastal state, and how those requirements should be reflected operationally by satellite network operators and service providers.
Question 2: Do you agree with our proposal to make additional spectrum available for aeronautical and maritime ESIMs connecting with GSO and NGSO satellites in Ka band (authorisations across 27.5-30 GHz), in line with the ITU framework?	Confidential? – N Yes. Telenor Maritime supports Ofcom's proposal to make additional Ka-band spectrum available for aeronautical and maritime ESIMs connecting with GSO and NGSO satellites, in line with the ITU framework. The proposal should improve the availability of contiguous spectrum, support higher capacity satellite connectivity and reduce fragmentation for operators serving vessels and aircraft. For maritime use, Telenor Maritime particularly welcomes the proposal to waive the 70 km separation requirement in the specific Ka-band frequencies where Ofcom has identified that fixed links do not require protection in the UK. We would appreciate if Ofcom published a clear operational table showing, for each band and orbit type, whether use is permitted in UK territorial waters, permitted only outside UK territorial waters subject to separation requirements, or dependent on prior agreement.

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Question 3: Do you agree with our proposed technical conditions for ensuring co-existence?	Confidential? – N Yes. Telenor Maritime supports the proposed reliance on relevant WRC Resolutions and associated technical conditions to ensure coexistence with incumbent services. The proposed approach appears appropriate where it is based on internationally agreed technical conditions, including non-interference/non-protection obligations, power and PFD/EIRP limits, minimum elevation-angle requirements and network control/monitoring capabilities. It would be useful if Ofcom provide practical implementation guidance for maritime ESIMs, including expectations for geofencing, terminal control and evidence of compliance. Guidance should also clarify which obligations sit with the Earth Station Network licensee, the satellite network operator/service provider, and the vessel operator or Ship radio licensee.
Question 4: Do you agree with our proposed amendments to the Earth Station Network, Aircraft radio, and Ship radio licence products to extend the authorisation for aeronautical and maritime ESIMs connecting to GSO and NGSO satellites?	Confidential? – N Yes. Telenor Maritime supports the proposed amendments to the Earth Station Network, Aircraft radio and Ship radio licence products. The use of existing licence products is a proportionate and efficient implementation route. Telenor Maritime encourages Ofcom to provide clear guidance on how the new frequency authorisations are reflected in each licence product and how existing licence holders will be affected by the proposed changes.
Question 5: Do you agree with our proposal to reflect these changes in the relevant Interface Requirements?	Confidential? – N Yes. Telenor Maritime supports updating Interface Requirements 2077 and 2093 to reflect the new frequency authorisations and the relevant WRC-based technical conditions. This will help ensure that equipment requirements, licence terms and operational expectations are aligned. We suggest that the Interface Requirements include clear and consistent tables for maritime, aeronautical and land ESIM use, distinguishing between GSO and NGSO use, transmit and receive frequencies, and any geographical or coastal-distance limitations. This would support consistent implementation by operators and reduce the risk of misunderstandings by customers.

Question	Your response
Question 6: Do you have any other comments on our overall approach to authorising ESIMs in these frequencies, and implementing this in our licensing framework?	Confidential? – N Telenor Maritime supports Ofcom's overall approach and welcomes the focus on international harmonisation and coexistence with incumbent spectrum users. To maximise the practical benefits of the new authorisations, we suggest that Ofcom provide concise operational guidance alongside any final statement, including examples of permitted maritime use in UK territorial waters, use outside UK territorial waters, and situations requiring prior agreement from a coastal state. As a provider of maritime connectivity services operating across multiple jurisdictions, Telenor Maritime would encourage Ofcom to continue pursuing regulatory alignment with European and international frameworks wherever possible. Vessels routinely operate between UK and EU waters, and differences in licensing conditions, authorised frequency ranges, orbital system eligibility, or operational restrictions could create unnecessary operational complexity for ship operators, service providers and satellite network operators. Telenor Maritime therefore encourages Ofcom to take account of ongoing CEPT, ITU-R and wider European regulatory developments when implementing the new ESIM framework and to seek the highest possible degree of regional harmonisation. In addition, Telenor Maritime notes that WRC-23 adopted Resolution 133 concerning studies of potential future use of the 12.75-13.25 GHz band by maritime and aeronautical ESIMs communicating with non-geostationary FSS systems. While this issue is outside the scope of the present consultation, any indication Ofcom can provide regarding the expected timetable for future consideration of NGSO ESIM access in this band would be valuable for long-term investment and deployment planning in the maritime sector.