

Your response

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Question 1: Do you have any views on the options for managing the 2 GHz MSS band after 13 May 2027? Are there any options that Ofcom has overlooked?	Confidential? - N Yes. Ofcom's options should more clearly recognise that the 2 GHz MSS band is now a strategic resource for security, resilience and sovereign communications, not only a band used by existing commercial services. Ofcom should add a further option: no general extension of the current authorisations beyond May 2027, followed by prompt implementation of a long-term UK framework aligned with the ECC/EU 10 MHz paired block model, including a dedicated secure MSS/hybrid allocation. This approach would better reflect the changing European security environment and the growing need for resilient, interoperable communications for public safety, defence, border protection, emergency response, maritime monitoring, BVLOS drone operations and critical infrastructure protection. The long-term value of the band lies in enabling secure MSS capability, supported where appropriate by complementary ground infrastructure, rather than in preserving historic assignments by default. The European Commission proposal of 27 May 2026 materially changes the policy context. Ofcom notes that the Commission has proposed three 2x10 MHz selection procedures, including one for a secure MSS/hybrid system, and that certain procedures would be limited to EU-owned or controlled operators. The UK should not lock itself into a 3–5 year extension that would delay or dilute alignment with that model.
Question 2: Do you agree with our proposal for a short-term transition period, which authorises Viasat and EchoStar? Please set out your reasoning.	Confidential? - N No. We do not agree with a general short-term transition period authorising Viasat and EchoStar for 3–5 years. A multi-year extension would preserve historic use during the period in which the UK should be preparing for the post-2027 European band plan and enabling new secure MSS/hybrid capability for public-interest missions. Before granting any continuation, Ofcom should test the evidence for actual current use. Several airlines have publicly indicated that they intend to move from EAN to alternative connectivity providers such as Starlink, and the number of customers served under the EchoStar authorisation appears to be small. We therefore encourage Ofcom to assess the current and forecast UK dependency on both authorisations, rather than treating historic assignments as sufficient justification for a general extension. We recognise the importance of managing any service disruption. However, continuity for incumbents should not override the wider citizen, consumer, national security and resilience benefits of enabling new sovereign capabilities. If Ofcom considers any transitional authorisation unavoidable, it should be strictly limited to technical wind-

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	down, migration and non-interference arrangements, with no presumption of continued rights and no ability to transfer, lease or sub-lease rights in a way that prejudices the future allocation. The alternative use cases are time critical. Europe faces an evolving threat environment, including hybrid attacks on critical infrastructure, drone threats, border pressure, maritime risks and GNSS-denied operating environments. Maintaining broad incumbent rights until 2030 or later would delay the practical availability of spectrum needed for secure MSS services, supported by complementary terrestrial or air-to-ground capabilities where appropriate.
Proposal for interim transition period	
Question 3: Do you agree with our preferred option for the duration of the proposed interim authorisation to be a three-year fixed period? Please set out your reasoning.	Confidential? - N We do not agree that a three-year fixed period is appropriate as the preferred option. A three-year extension would run from May 2027 to May 2030 and would therefore occupy the key window in which the UK should be enabling the post-2027 European model and rapid deployment of new sovereign capability. If Ofcom decides that some form of transition is unavoidable, the duration should be materially shorter, objectively justified, and linked to specific migration milestones. It should also include an early termination or review mechanism if the ECC/EU framework is settled sooner, or if a credible secure MSS/hybrid applicant is ready to deploy. The authorisation should not be structured in a way that creates legitimate expectations of renewal or delays reallocation to higher-value resilience, defence and public safety use cases.
Question 4: Do you agree that our proposed approach to authorise continued use of the spectrum during the interim authorisation period through a CGC licence, licence exemption, and Aircraft Radio licence? If not, please set out your reasoning and alternative suggestions.	Confidential? - N If Ofcom proceeds with an interim authorisation, the mechanism should be narrow, transparent and operationally constrained. The framing should remain MSS first, with any CGC licence, licence exemption or Aircraft Radio licence used only as a supporting authorisation needed to maintain clearly evidenced services during a short transition. These mechanisms should not entrench incumbent rights, broaden the scope of existing use, or prejudice the long-term reassignment of the band. Any interim authorisation should include clear conditions: no expansion of service scope, no material network extension, no transfer or sub-lease that could undermine future reassignment, robust reporting of actual UK use, and technical constraints to protect trials or early deployments by additional users. Ofcom should also preserve the abil-

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	ity to authorise pilots, demonstrations and technical studies for secure MSS/hybrid systems during the interim period.
Question 5: Do you have any comments on the alternative approach we have considered, of licensing the satellite operators to use 2 GHz MSS during the interim authorisation period? If you have a preference for this approach, please set out your reasoning.	Confidential? - N We do not prefer the alternative approach of licensing the satellite operators directly for the interim period if that would result in broader, less disciplined rights than the CGC/licence exemption model. Direct licensing may be administratively simpler, but it could also make the continuation of incumbent use appear more permanent and make later reallocation more difficult. If Ofcom considers direct licensing, it should only be adopted with explicit sunset provisions, non-renewal language, revocation flexibility, detailed use reporting, and conditions preventing spectrum hoarding or speculative trading. The central objective should be to preserve regulatory optionality for the long-term framework rather than to maximise incumbent continuity.
Question 6: What are your views on the approach Ofcom should take to fees for the interim authorisation period? Please set out your reasoning and provide evidence where appropriate.	Confidential? - N Fees should reflect the public value and opportunity cost of the band during the transition. We do not support a fee waiver if it would reduce incentives for efficient use or create an unjustified benefit for incumbents occupying spectrum that could otherwise support strategic national resilience and security applications. At minimum, any fee approach should be linked to actual use, should not reward under-utilisation, and should include transparency on the basis for the charge. If Ofcom concludes that the opportunity cost is uncertain, that uncertainty should support a shorter and more conditional transition, not a longer fee-free occupation of the band.
Question 7: Do you agree with our proposals to enable additional users to access the spectrum during the interim period? If yes, do you have a preference for how we should enable other users during the short-term extension period? Please set out your reasoning.	Confidential? - N Yes. If any interim period is created, Ofcom should enable additional users to access the spectrum, particularly where doing so supports innovation, public safety, defence, emergency response, drone connectivity, A2G communications, infrastructure monitoring or other resilience-oriented applications. Our preference is for Ofcom to create a direct, time-limited authorisation route for additional users, similar in principle to local or shared access licensing but adapted for MSS/A2G characteristics. This should not depend on incumbent consent. Access should be subject to technical coordination, non-interference requirements and clear geographical or operational limits where appropriate. This route would allow ARES-related demonstrations, pilots and operational readiness work to proceed before the long-term regime is fully implemented.

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	If the lower 15+15 MHz segment used for EAN must be extended after May 2027, Ofcom should consider a spatially limited authorisation rather than a blanket UK-wide continuation. Such an authorisation should be limited to the routes, airspace or operating areas where the remaining airline services genuinely require continuity. This would reflect actual use rather than historic entitlement, and could enable earlier deployment of secure MSS/hybrid services in other areas, including operationally relevant geographies such as Europe's Eastern Flank.
Question 8: Do you have any other views on the details of our proposal to authorise Viasat and EchoStar during the interim period?	Confidential? - N Ofcom should ensure that any interim authorisation contains robust safeguards. These should include a clear statement that the authorisation is temporary and non-precedential; a prohibition on expansion beyond existing deployed services unless expressly authorised; reporting on usage, capacity and terminals; obligations to cooperate with coexistence testing; and conditions enabling early trials by secure MSS/hybrid operators. Ofcom should also be cautious about creating any secondary market mechanism during the interim period. Leasing or transfer may appear efficient in the short term, but it risks allowing private arrangements to pre-empt the strategic public policy choices that Ofcom and government must make for the post-2027 band.
Proposals for deciding on our longer-term approach to 2GHz MSS	
Question 9: Do you have any comments on the technical and operational implications of the four approaches to long term authorisation we have set out?	Confidential? - N From an ARES perspective, the upper portion of the S-band — 1995–2010 MHz paired with 2185–2200 MHz — is particularly important because it can be used concurrently by a satellite component and a complementary cellular A2G (CGC) component. This supports resilient communications for BVLOS drones, helicopters, maritime and border operations, infrastructure monitoring and GNSS-denied environments. Coexistence will require technical coordination, including power density limits, antenna isolation, protection of satellite and A2G links, and careful management of co-channel scenarios; however, these issues are manageable if the band plan is designed around the secure MSS/hybrid use case from the outset.
Question 10: Which would you consider is the optimal approach to take for long-term authorisation? Are there any alternative approaches we	Confidential? - N The optimal long-term approach is a UK framework aligned with the ECC/EU 10 MHz paired block model, including a dedicated secure MSS/hybrid allocation for sovereign and security applications. MSS should remain the primary regulatory category, with complementary ground or air-to-ground capability authorised as a supporting

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have not considered? If so, please outline them.	layer where it improves resilience, availability or operational utility. The framework should be implemented through a competitive, transparent and time-bound authorisation process with eligibility and control requirements reflecting the strategic nature of the spectrum. Ofcom should consider an alternative approach that explicitly distinguishes three categories of use: continuity of existing MSS services where justified; commercial MSS or direct-to-device innovation where compatible with the band plan; and a dedicated secure MSS/hybrid allocation for governmental, defence, public safety and critical infrastructure resilience applications. The last of these should not be treated as a residual or secondary use. It should be designed into the framework as a primary public-interest objective.
Question 11: Do you have any further comments on factors we should consider when determining our approach to the longer-term UK authorisation of the 2 GHz MSS band?	Confidential? - N Ofcom should consider the following additional factors when determining the longer-term UK authorisation approach: alignment with European policy and economies of scale; the need for sovereign operational control; resilience against hybrid attacks; cybersecurity risks associated with broad consumer handset compatibility; the value of an ecosystem that is not embedded in public mobile networks; deployment speed; compatibility with IRIS² without waiting for IRIS²; and the need for UK operators and public authorities to participate in a coherent European capability. The ARES proposition demonstrates that these factors are practical rather than abstract. A secure MSS-led network, supported by complementary ground or air-to-ground components where required, could use commercial technologies, open standards and existing infrastructure to deploy quickly and scale across Europe. It would support mission-critical broadband for drones and aircraft, infrastructure monitoring, maritime operations, border protection, public safety and defence. These benefits should be given substantial weight in Ofcom's public interest analysis.
Question 12: Do you have any comments on the Impact Assessments?	Confidential? - N The Impact Assessments should be broadened. They should not focus primarily on the administrative or continuity impacts of interim authorisation for current incumbents. They should also assess the opportunity cost of delaying reallocation, including the lost value of secure satellite and complementary A2G capability, critical infrastructure resilience, emergency response, defence applications, BVLOS drone operations and sovereign European technology development. In particular, Ofcom should assess whether a 3–5 year extension would impose a material strategic cost by preventing timely UK participation in a harmonised European secure MSS/hybrid ecosystem. The assessment should

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	also consider the risks of spectrum fragmentation, continued under-utilisation, cyber exposure from broad consumer-device models, and the consequences of relying on non-sovereign systems for critical communications. A complete impact assessment should compare incumbent continuity against the wider public value of releasing the band for ARES-type capabilities.