

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?	
Question 2: Do you agree with our proposal for a short-term transition period, which authorises Viasat and EchoStar? Please set out your reasoning.	
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.	
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.	
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.	

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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.	
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.	
Question 8: Do you have any other views on the details of our proposal to authorise Viasat and EchoStar during the interim period?	
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?	AST SpaceMobile urges that Ofcom choose a long-term authorization approach that enable innovative broadband D2D services, maximize public value for the UK, promote competition, and help meet broadband coverage goals. A fresh assignment process, whether through a UK-led competitive award, or partly or fully aligned with the EU process, would best meet such objectives. AST SpaceMobile does not support either an ITU filings-led approach or status-quo approach with trading option. Prioritising operators with the highest-ranking ITU filings risks entrenching incumbent positions, limiting innovation, and preventing capable operators from entering the UK market with advanced direct-to-device services. On the other hand, a status-quo approach would preserve existing market concentration and create significant barriers to entry for new operators. Access to

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	spectrum should not depend on the willingness of incumbent licensees to sell, lease, or consolidate spectrum assets. Instead, spectrum access should be determined through a transparent regulatory framework that enables direct participation by multiple qualified operators and promotes competition, investment, and consumer choice.
Question 10: Which would you consider is the optimal approach to take for long-term authorisation? Are there any alternative approaches we have not considered? If so, please outline them.	We urge that the future authorisation framework for the 2 GHz MSS band enable satellite broadband direct-to-device (D2D) services and provide successful applicants with sufficient spectrum resources to deliver high-quality services at scale to the British public and support the UK's Wireless Infrastructure Strategy. AST SpaceMobile considers that assignments of up to 2×15 MHz would best support the delivery of mass-market broadband D2D services. AST SpaceMobile also recognises the importance of maintaining broad alignment between the UK and neighbouring European administrations with respect to the future use of the 2 GHz MSS band. Such alignment is important to facilitate cross-border coordination, promote investment certainty and support the development of a harmonised European ecosystem for D2D services. However, alignment need not require identical spectrum assignments in every jurisdiction, provided that the underlying technical and regulatory frameworks remain compatible. D2D mobile broadband represents the highest and most valuable use of the 2 GHz MSS band because it can deliver the greatest benefits to UK consumers, businesses and public services from a finite spectrum resource. Unlike legacy MSS applications serving relatively narrow user groups, D2D enables connectivity directly to ordinary smartphones and can therefore extend the benefits of satellite communications to the mass market. D2D services can complement terrestrial mobile networks by extending coverage beyond the reach of traditional infrastructure, improving communications re-

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	silience during outages and emergencies, and supporting connectivity in rural, remote, maritime and hard-to-reach areas. These capabilities directly support UK policy objectives relating to digital inclusion, resilient communications networks and economic growth. The 2 GHz MSS band is particularly well suited to enabling satellite-mobile broadband services integrated with mobile network operators. A long-term authorisation framework that supports D2D deployment would promote innovation, stimulate investment, enhance competition and maximise the public value derived from the spectrum. For these reasons, Ofcom should recognise D2D broadband as the use case with the greatest potential to generate long-term consumer welfare, economic and societal benefits from the 2 GHz MSS band, and should ensure that the future authorisation framework enables those benefits to be realised at scale. AST SpaceMobile considers that assignments of up to 2×15 MHz (15 MHz uplink paired with 15 MHz downlink) would provide the most effective basis for supporting mass-market broadband Direct-to-Device (D2D) services and maximising the value derived from the UK's MSS spectrum resources. First, broadband D2D requires sufficient paired spectrum to deliver meaningful throughput and capacity. Unlike emergency messaging or narrowband services, broadband D2D must support data-intensive applications, simultaneous users, and future growth in demand. A 2×15 MHz channel provides enough contiguous spectrum to support modern broadband waveforms, improved spectral efficiency, and scalable service delivery. Smaller allocations would constrain capacity, reduce user experience, and limit the viability of broadband services. Second, a 2×15 MHz assignment reduces fragmentation and enables more efficient broadband D2D operation. D2D networks benefit significantly from scale.

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	Larger contiguous blocks allow more efficient radio planning, lower guard-band losses, simplified device implementation, and greater spectral efficiency than several smaller fragmented assignments. This increases the amount of traffic that can be carried per MHz and reduces waste. Third, D2D economics favour larger spectrum blocks. Satellite constellations require substantial investment in space and ground infrastructure. Operators need enough spectrum to justify these investments and deliver services that are competitive with terrestrial only mobile offerings. A 2×15 MHz allocation improves business viability by enabling broadband services rather than limiting the market to low-value messaging applications. Fourth, broader channel bandwidth directly advances UK connectivity objectives. Ofcom has identified D2D's key benefits as extending coverage beyond terrestrial networks, improving resilience, and supporting innovation across sectors. A 2×15 MHz allocation allows D2D to evolve from basic emergency communications into a genuine broadband capability that supports consumers, businesses, IoT applications, public services, transport, agriculture, maritime users, and critical national infrastructure. Fifth, ensuring that successful applicants have access to sufficiently large contiguous assignments would help future-proof the band and support the evolution of integrated terrestrial and non-terrestrial broadband services as demand grows. The UK's policy objective is not simply to support satellite messaging, but to enable integrated terrestrial and non-terrestrial networks and next-generation wireless services. A 2×15 MHz allocation now avoids regulatory inefficiencies and repeated re-farming exercises as D2D demand grows.
Question 11: Do you have any further comments on factors we should consider when determining our approach	

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to the longer-term UK authorisation of the 2 GHz MSS band?	
Question 12: Do you have any comments on the Impact Assessments?	