

Introduction

The BBC welcomes the opportunity to respond to Ofcom’s proposals for the future authorisation and regulation of the 2 GHz Mobile Satellite Services (MSS) bands. While MSS supports voice, data and critical safety-of-life communications, the 1980–2010 MHz and 2170–2200 MHz bands also support terrestrial wireless camera assignments used for film and TV production.

Ofcom’s data from the Sector Spectrum Review (Programme Making and Special Events, PMSE) shows that there were 75,000 wireless camera assignments between 2018 and 2024 across all Video PMSE bands at 2 GHz and 7 GHz, as well as in ad hoc bands. Individual 2 GHz assignment demand increased by 30% and 7 GHz assignment demand increased by 149% between 2018 and 2024. The data also does not capture multiple daily incidents of 2 GHz use for news gathering under single annual licences.

Wireless cameras are typically assigned in the 2 GHz MSS bands only after the main 2 GHz Video PMSE bands are fully occupied. Despite this, there were 1,210 assignments in 1980–2010 MHz and 650 assignments in 2170–2200 MHz in the 2 GHz MSS band ranges between 2018 and 2024.

The 2 GHz MSS assignments remain vital for both high-demand events—for example, the British Grand Prix at Silverstone and the Open Golf Championships at locations across the UK – and other events where other video PMSE spectrum is unavailable.

The consultation document describes PMSE use of the MSS bands as “opportunistic”¹. Ofcom has though legitimately assigned PMSE in the 2 GHz MSS bands on a secondary basis, compatible with MSS, for many years. Indeed, ongoing access to the 2 GHz MSS bands for PMSE and wireless cameras remains essential to meet peak demand for future coverage of major events, particularly given the uncertainty around continued access to core video PMSE bands. Specifically the 2010–2025 MHz range is at risk from WRC-27 Agenda Item 1.12. Ofcom has also proposed the immediate removal of PMSE from 7110–7125 MHz across the whole of the UK, not only from high-density areas. In addition, the remainder of the 7 GHz band could be lost to International Mobile Telecommunications (IMT) as a result of WRC-27 Agenda Item 1.7.

These simultaneous threats to Video PMSE bands at 2 GHz and 7 GHz pose a serious risk to programme makers’ ability to cover anything beyond minor events in the future. Demand for Video PMSE spectrum continues to grow, as shown by the PMSE Sector Review, supporting the government’s goal to raise annual investment in the Creative

¹ 2.26 In addition to the licensed MSS use, there has also been some opportunistic short-term use of these frequencies on a secondary basis by PMSE services for low power video links.

Industries from £17 billion to £31 billion by 2035², while in 2024, the creative industries contributed an estimated £145.8 billion—5.5% of UK gross value added (GVA)³.

Because these multiple spectrum changes are being managed by different parts of Ofcom, their combined impact on Video PMSE may have been overlooked. The PMSE Review, now under way within Ofcom, is the appropriate means to determine future demand for video PMSE and hence to decide on future spectrum to be made available. In our view, Ofcom should not be making ad hoc decisions on PMSE spectrum availability, such as those proposed in this consultation, before the completion of the broader PMSE Review.

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?

While the band remains harmonised across the European Union and the UK to be used for pan-European MSS, the only viable options for 2 GHz MSS spectrum are those presented, namely continuing or ceasing the current services in the UK. Any other options to repurpose the band for other services now would be premature and liable to change depending upon the outcome of future EU decisions.

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

In the absence of alternative options and while the European Commission proposals remain under consideration it would be reasonable to continue authorising the current licensees. Once decisions have been made on longer-term access to the band other options may be open to consideration.

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.

The three-year fixed period would appear appropriate to give sufficient time to accommodate the EU decision making process.

² UK Government The UK's Modern Industrial Strategy – Creative Industries Sector Plan https://assets.publishing.service.gov.uk/media/68920e22dc6688ed50878479/industrial_strategy_creative_industries_sector_plan_accessible.pdf

³ <https://www.gov.uk/government/statistics/dcms-economic-estimates-gva-2024-provisional/dcms-sectors-economic-estimates-gross-value-added-2024-provisional>

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.

The current authorisation arrangements would appear appropriate for continuity 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.

No comment.

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.

No comment.

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.

The BBC supports access to 2 GHz MSS spectrum for research, development and trials without prejudice to future decisions on the band use.

Provided the current PMSE access to 2 GHz MSS spectrum is not impacted, access for additional users would be provided for specified time periods during the short-term extension period.

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

No comment.

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?

No comment.

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.

The BBC has no view on the specific long term authorisation approach for 2 GHz MSS services provided PMSE access continues on the current basis.

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?

No comment.

Question 12: Do you have any comments on the Impact Assessments?

No comment.