

## Your response

| Question                                                                                                                                                                                | Your response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| <p><b>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?</b></p>                      | <p>The GSMA broadly agrees with authorising a short-term extension for authorised users under option three. This approach could maintain service continuity where required while allowing a long-term framework that aligns with European approaches and develops the band for those able to make most efficient use of the spectrum. Any extension should be limited to preserving existing services during the transition period and should not permit the transfer or trading of spectrum rights, or the launch of new commercial services that could influence future market outcomes. Allowing operators to expand their rights during an interim period may not support the work of Ofcom in determining the optimal long-term authorisation. Temporary arrangements should therefore remain narrowly focused on continuity of service and should not prejudice the development of a competitive long-term framework for the spectrum.</p> |
| <p><b>Question 2: Do you agree with our proposal for a short-term transition period, which authorises Viasat and EchoStar? Please set out your reasoning.</b></p>                       | <p>N/A</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p><b>Proposal for interim transition period</b></p>                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <p><b>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.</b></p> | <p>The GSMA agrees with Ofcom's proposal of a three-year fixed period. This timeframe would allow Ofcom to take account of developments towards a future EU framework before establishing a longer-term approach that aligns with it. In the interim, it could support continuity of service, provide regulatory certainty, and help ensure that the spectrum continues to be used efficiently while future arrangements are developed.</p> <p>Alignment with any European framework is the most important issue of this process, given the nature of satellite communications and the need for regional harmonisation. Given that the European framework should be in place within two years, a further year will give Ofcom</p>                                                                                                                                                                                                                |

| Question                                                                                                                                                                                                                                                                                      | Your response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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|                                                                                                                                                                                                                                                                                               | time to align with it, without requirement for extending the interim licences further.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <p><b>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.</b></p> | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <p><b>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.</b></p>                  | <p>The proposal to license satellite operators during the interim period does not appear to be necessary to achieve the primary objective of maintaining continuity of existing services while the long-term framework for the band is developed. Introducing a new licensing approach for a temporary period could represent a significant change to the existing authorisation model, despite the limited duration of the arrangement. It is therefore unclear what additional benefits such an approach would provide relative to arrangements that more closely reflect the current framework. Retaining a proportionate and stable interim regime may help minimise unnecessary regulatory complexity while future authorisation arrangements are considered.</p> |
| <p><b>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.</b></p>                                                                                           | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <p><b>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.</b></p>           | <p>Some testing and development may be helpful ahead of the provision of long-term licences in the 2 GHz MSS band. The GSMA thus agrees that allowing additional users to access the spectrum during the interim period on a temporary basis for testing purposes. This could encourage innovation by enabling new services to enter the market while longer-term arrangements are developed. It would also help ensure that the spectrum is</p>                                                                                                                                                                                                                                                                                                                       |

| Question                                                                                                                                                                                                  | Your response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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|                                                                                                                                                                                                           | <p>used efficiently throughout the transition period, maximising its benefits for users while maintaining continuity for existing services.</p> <p>However, temporary testing arrangements should be structured so that they do not confer a commercial advantage or create a de facto pathway to longer-term access. Spectrum rights during the interim period should therefore be subject to Ofcom's approval and competition safeguards.</p>                                                                                                                                                                                                                                                                                |
| <p><b>Question 8: Do you have any other views on the details of our proposal to authorise Viasat and EchoStar during the interim period?</b></p>                                                          | <p>N/A</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p><b>Proposals for deciding on our longer-term approach to 2GHz MSS</b></p>                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <p><b>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?</b></p>                                       | <p>The GSMA does not believe that the minimal intervention (ITU filings-led approach) presented in option A is sufficient to ensure efficient use of the spectrum. Option A may not align with the European Commission's proposals and could create a fragmented authorisation approach and impact service deployment. Similarly, option B which would retain the status quo but introduce scope for trading, falls short of ensuring efficient use of the spectrum and risks misalignment with a future EU framework.</p>                                                                                                                                                                                                     |
| <p><b>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.</b></p> | <p>The GSMA believes that Ofcom should prioritise its Option D approach and seek to align with the European Union's updated MSS framework. As the consultation document notes, MSS services are international, span multiple jurisdictions and rely on usage across wide geographic areas, so alignment with the EU could help reduce interference risks and support deployment. It could also provide greater regulatory certainty for operators, manufacturers and investors by reducing the risk of divergent spectrum frameworks emerging across Europe. A more harmonised approach may support economies of scale, facilitate the development of equipment and device ecosystems, and encourage more efficient use of</p> |

| Question                                                                                                                                                                           | Your response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|                                                                                                                                                                                    | <p>spectrum resources. A competitive award process envisioned through Option C is appropriate but should ultimately be aligned with the EU approach. If Ofcom deems some variation appropriate for the UK circumstances, this should be workable alongside the EU decisions and should not prevent UK operators from competing for awards in the EU.</p> <p>Frameworks should remain agile to accommodate new technologies and business models, while continuing to ensure efficient spectrum use and fair access. Regulatory frameworks must ensure regulatory parity and maintain effective coexistence between MSS and terrestrial mobile services, which will be essential to enhance connectivity without creating harmful interference or undermining existing services.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p><b>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?</b></p> | <p>The GSMA agrees that MSS applications can enhance connectivity for UK consumers and their use should be allowed while ensuring that mobile and other critical services are protected from harmful interference.</p> <p>The use of satellite connectivity as part of a mobile network can supplement a terrestrial operator's network coverage with the right regulation. Providing this broader coverage layer can help mobile to reach further into sparsely populated or inaccessible locations. D2D infrastructure can also provide an added layer of network resilience as signals from satellites can still be received in the event of terrestrial network outage, including support for emergency services where terrestrial networks fail.</p> <p>As highlighted in the consultation document, D2D operations can use two spectrum categories: frequency bands allocated to the mobile service and identified for IMT, or bands already allocated to MSS. The benefit of using MSS spectrum is because it already carries harmonised technical and regulatory rules at the International Telecommunications Union (ITU). A number of countries have, or are considering, regulatory frameworks for D2D in MSS bands. Today, however, only a limited number of high-end handsets can operate in MSS bands. In contrast, standard handsets can use IMT spectrum for D2D. This requires commercial agreements between mobile</p> |

| Question | Your response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|          | <p>network operators (holders of the terrestrial spectrum licences) and satellite network operators.</p> <p>Regardless of the spectrum used, D2D's largest obstacle is its technical limitations. The larger footprint of satellite beams compared to terrestrial cells limits the amount of data that can be delivered in any area. Free space path loss is also significantly higher, and these two factors impact network quality.<sup>1</sup> Therefore, D2D use will be limited in densely populated areas and indoors.</p> <p>D2D can provide a valuable supplemental technology for the mobile industry, new business for the satellite and mobile sectors, improve resilience and extend access to services for end-users. Governments should allow mobile operators to deploy D2D services in partnership with satellite operators. However, it should only be used as one aspect of improving connectivity in the UK in providing a low-bandwidth coverage layer. Policies which improve the reach of terrestrial mobile by encouraging network investment should also be pursued to enhance coverage, while closing the usage gap (those who live within the footprint of a mobile network but do not use it) requires a focus on harmonisation and affordability.<sup>2</sup></p> <p><i>WRC-27</i></p> <p>As noted in the consultation document, WRC-27 will consider new allocations for MSS services. Any new allocation in mobile bands following the Conference must protect IMT against harmful interference. Furthermore, if MSS-based service providers offer service directly to the end user without partnering with a terrestrial mobile network operator, it needs to comply with the same set of licensing, security and consumer-protection obligations, including, lawful interception, know your customer (KYC), etc., as the terrestrial mobile operators.</p> <p>Generic MSS and IMT should not be authorised in the same band and coverage area. While, under WRC-27 Agenda Item 1.13, the GSMA supports the use of a specific MSS application, namely D2D, under carefully designated technical and regulatory conditions, it does not support generic MSS use across existing IMT identifications. This should be recognised by not identifying any</p> |

<sup>1</sup> [The Limits of D2D: Modelling the extent of D2D connectivity](#), GSMA, 2026.

<sup>2</sup> [Spectrum for D2D Public Policy Paper](#), GSMA, 2025.

| Question | Your response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|          | <p>new spectrum for MSS in parts of the S-band covered by WRC-27 AI's 1.14 and 1.12. The GSMA believes it is not possible to bring generic MSS into bands used by IMT at WRC-27 while ensuring IMT is protected.</p> <p><b>Regulatory Considerations</b></p> <p>While LEO satellite constellations remain in early stages of deployment, we are seeing satellite services evolving fast and providing standalone direct to user offering with satellite broadband services currently in the UK. With D2D services, as noted in the paper, satellite companies have plans to reach to customers directly using MSS frequencies in the future, operating independently without partnerships with mobile operators.</p> <p>Where satellite services are delivered through partnerships with terrestrial network operators, established regulatory frameworks could typically provide sufficient safeguards. In contrast, where LEO services are provided without such partnerships, existing policies are often less explicit or remain underdeveloped. In case of the UK, the licensing regime is technology neutral.</p> <p>However, GSMA believes that the advancements in non-terrestrial satellite network communications and evolving D2D technologies should be clearly reflected in regulatory frameworks. Among the five core principles outlined in the GSMA's public policy paper<sup>3</sup> on Satellite Regulatory preparedness, regulatory parity is most critical for the UK market. As mobile and satellite operators (without partnerships) offer increasingly equivalent services, the issue of regulatory consistency needs to be tackled. Uneven operational licensing and regulatory obligations risk distorting market dynamics and may result in uneven levels of consumer protection, gaps in service reliability, and inconsistencies in other areas.</p> <p>To help guide the development of regulatory frameworks globally, the GSMA has recently launched the Satellite Regulatory Playbook<sup>4</sup> which highlights eight regulatory themes that are applicable to emerging satellite services delivered via LEO constellations when offered directly to end users without partnerships with terrestrial</p> |

<sup>3</sup> [Regulatory Preparedness for Satellite Services](#), GSMA, 2026.

<sup>4</sup> [Satellite Regulatory Playbook](#), GSMA, 2026.

| Question                                                                | Your response                                                                                                                                                                                                                                                                                                                       |
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|                                                                         | <p>operators. Ofcom is requested to reflect on these regulatory considerations either as part of this consultation or as a separate detail consultation.</p> <p>Ofcom is encouraged to have a framework that supports fair regulatory landscape that applies consistent regulatory measures to all telecommunications services.</p> |
| <b>Question 12: Do you have any comments on the Impact Assessments?</b> | N/A                                                                                                                                                                                                                                                                                                                                 |