

Future use of 2 GHz MSS

Response to Ofcom's consultation on 1980–2010 MHz and 2170–2200 MHz from May 2027

Respondent capacity: Individual/private capacity

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Executive summary

This response supports a controlled, three-year transitional authorisation for the two incumbent 2 GHz mobile-satellite service (MSS) operators from 14 May 2027. That is the least disruptive credible bridge between expiry of the present arrangements and a properly evidenced long-term decision. It should preserve existing services without conferring an expectation of renewal, exclusivity or long-term entitlement.

The transition should be implemented as one coherent package: a precisely amended terminal exemption, time-limited complementary ground component (CGC) licences, continued Aircraft Radio licensing where it remains fit for purpose, a coordinated operational endpoint across the instruments, a published evidence timetable and clear change-notification and transition-out requirements. Three years is preferable to five. Any further extension should be exceptional, separately justified and consulted upon.

Additional access should be enabled during the transition where Ofcom is satisfied, on evidence, that the proposed use will not cause undue interference and can be authorised consistently with Ofcom's duties. Direct licensing is the better initial route for commercial or beta deployments because it provides an identifiable licensee, enforceable conditions and control over frequency, geography, power, duration and change. A class exemption may become appropriate for a demonstrably homogeneous, low-risk category, but should not be stretched to accommodate bespoke configurations. Incumbents should provide necessary coordination information but should not have a separate veto over Ofcom's domestic authorisation decision; applicable ITU coordination requirements and higher-priority filing positions would remain relevant.

For the long term, this response favours a hybrid of a UK-led selection and authorisation process with selective European alignment. The United Kingdom should retain control over operator selection, competition design, licence conditions and enforcement while aligning, where the evidence supports it, on band segmentation, technical parameters, service dimensions and equipment ecosystems. Alignment is not binary. Ofcom should not wait indefinitely for the European Union process, which is still an ongoing legislative proposal, or treat unresolved World Radiocommunication Conference 2027 studies as decisions.

The consultation's impact assessment is directionally sound for a short bridge, but needs fuller treatment of dynamic competition, investment asymmetry, changes of ownership or control, the costs

of transition failure, rural and service-continuity effects, and the option value of preserving more than one feasible long-term outcome.

Issue	Recommended position	Essential safeguard
Incumbent continuity	Authorise both current operators for three years	No presumption of renewal or long-term entitlement
Legal implementation	Coordinated exemption, CGC and aircraft arrangements	Precise frequencies, coordinated operational endpoint and responsibility map
Additional access	Permit evidence-supported access during the bridge	Ofcom decision, enforceable conditions and no separate domestic incumbent veto; ITU coordination remains
CGC fees	Retain the existing fee structure initially	Separate long-term fee review; no unsupported numerical AIP
Long-term model	UK-led process with selective European alignment	Competition, coordination and implementation evidence before award
Evidence base	Refresh standards, devices, payloads, filings, coexistence and demand	Distinguish standards from deployed capability and filings from UK rights

Purpose, scope and evidential approach

Ofcom’s consultation concerns the paired bands 1980–2010 MHz (Earth-to-space) and 2170–2200 MHz (space-to-Earth), and the regulatory position after the 2010-based spectrum access authorisations and Viasat’s present CGC network licence cease to have effect on 13 May 2027. The Wireless Telegraphy (Mobile Satellite System Equipment) (Exemption) Regulations 2016 currently exempt specified user terminals associated with Inmarsat and EchoStar, while separate licensing applies to CGC base stations and to relevant aircraft equipment. The 2016 Regulations remain in force unless amended or revoked. The Authorisation of Frequency Use for the Provision of Mobile Satellite Services (European Union) Regulations 2010 (SI 2010/672) will be revoked with effect from 14 May 2027 by the Authorisation of Frequency Use for the Provision of Mobile Satellite Services (European Union) (Revocation etc.) Regulations 2026 (SI 2026/180).

This response addresses the consultation as a private individual. It does not claim operator, manufacturer, investment or technical-testing evidence that the respondent does not possess. It therefore distinguishes carefully between:

- powers and authorisations that exist under current law, and policy proposals that would require a future Ofcom decision or legislative instrument;
- short-term service continuity, and any long-term allocation or entitlement;
- an International Telecommunication Union filing or coordination position, and a United Kingdom national authorisation to establish or use wireless telegraphy apparatus;
- the presence of a feature or band in a technical standard, and equipment, satellite payload or service capability actually available at scale; and

- the choice of an authorisation mechanism, and engineering evidence that two or more proposed uses can coexist without undue interference.

The principal sources are Ofcom's consultation, its 2025 call for input and published stakeholder responses; the Wireless Telegraphy Act 2006 and Communications Act 2003; the applicable statutory instruments; the Government's 2026 Statement of Strategic Priorities; official European Union, Radio Spectrum Policy Group, International Telecommunication Union, 3GPP and ETSI materials; and relevant Ofcom spectrum-management publications. Stakeholder submissions are used to identify demand and contested propositions, not to convert interested-party assertions into established facts.

The current regulatory setting matters. Ofcom must act within its statutory duties, including securing optimal use of the electro-magnetic spectrum, furthering the interests of citizens and consumers where appropriate by promoting competition, having regard to investment and innovation, and applying regulatory principles including transparency, accountability, proportionality and consistency. The Act also supplies licensing, exemption, fee, variation, revocation and enforcement powers. Those powers do not, by themselves, answer the policy question of who should receive future access or prove that technically overlapping uses can coexist.

The Government's 2026 Statement of Strategic Priorities emphasises growth, investment, efficient spectrum use, sharing, satellite services, resilience and international cooperation. Those objectives support a bridge that avoids unnecessary service disruption while preserving the ability to improve use of the band. They do not require automatic renewal of existing arrangements or mechanical replication of an emerging overseas model.

Cross-cutting conclusions

A bridge must be genuinely transitional

The present timing problem is real. The 2010 Regulations cease to have effect on 14 May 2027, while long-term European and international developments remain unresolved. Immediate clearance would create avoidable discontinuity and could strand services and investment. Conversely, a long extension with weak conditions could determine the long-term outcome by inertia. A three-year authorisation, with a published decision programme and explicit non-prejudice language, strikes the better balance.

An incumbent bridge should not be described or administered as a renewal of a property-like right. It would be a new United Kingdom authorisation for the period after 13 May 2027 under the Wireless Telegraphy Act 2006 framework and the instruments Ofcom then adopts. The bridge or incumbency should not, merely by themselves, create a presumption, assurance or entitlement to renewal. A change in the commercial ownership of an incumbent business, a transfer of assets or an overseas transaction does not itself transfer or create United Kingdom spectrum rights.

Additional access needs both legal accountability and engineering proof

Demand exists for direct-to-device, narrowband internet-of-things, public-safety, connectivity and other satellite applications. Published responses show materially different requested bandwidths, service models, maturity claims and preferred tenure. That diversity argues against treating all new uses as a single class before their interference characteristics and operational controls are understood.

A direct licence is therefore the most controllable initial route for commercial additional access. Ofcom can tailor it to a defined frequency range, geography, service, equipment configuration, power, duration and coordination obligation. The Innovation and Trial licensing framework may be suitable for research or tightly limited trials that are not a substitute for a commercial authorisation. A class exemption can be considered later if experience establishes a stable, low-risk and readily enforceable category.

No authorisation label makes sharing technically feasible. An application should be supported by reproducible coexistence and coordination evidence relevant to the proposed orbital, terrestrial, terminal and traffic configuration. Ofcom should decide whether the evidence is sufficient. Information from incumbents may be necessary, but a requirement to obtain their commercial consent would give them an inappropriate gatekeeping role.

International alignment should be decomposed

European alignment can concern several different things: paired frequency blocks, technical conditions, service categories, equipment parameters, operator eligibility, selection process, licence duration, security requirements and implementation timetable. Those dimensions need not travel together.

The European Commission's COM(2026) 311 proposal, dated 27 May 2026, remains in the ordinary legislative procedure. Ofcom summarises the proposed allocation as three 2x10 MHz lots, but Article 4 is framed as six paired 5 MHz blocks: two contiguous paired 5 MHz blocks primarily for the secure MSS/hybrid system, with commercial rights available as paired 5 MHz blocks, multiples or portions, subject to a paired 10 MHz commercial cap. Article 20 proposes a two-year incumbent extension upon request, under the authorisation conditions applicable at the date of entry into force, with no transfer, lease or sub-lease and possible sharing conditions for testing and experimental use. These remain proposals, not current United Kingdom law or a settled European outcome. Likewise, World Radiocommunication Conference 2027 agenda-item studies are preparatory work rather than adopted Radio Regulations. Ofcom should monitor both, publish decision dependencies and retain a timed United Kingdom route if external processes slip.

The current ITU Radio Regulations supply a separate international layer. Article 5 includes co-primary mobile-satellite allocations alongside fixed and mobile allocations in these bands; the bands are not internationally MSS-exclusive. No. 5.389A subjects MSS use of 1980–2010 MHz and 2170–2200 MHz to coordination under No. 9.11A and to Resolution 716 (Rev.WRC-23). Articles 9 and 11 govern coordination and the notification and recording of assignments; recording in the Master International Frequency Register can carry international consequences. Those international procedures are administered through national administrations. They neither replace Ofcom's domestic authorisation

decision nor guarantee that a proposed United Kingdom service is technically or commercially deliverable.

The three nearby WRC-27 agenda items also have defined and limited status. Agenda item 1.12, under Resolution 252 (WRC-23), studies possible MSS allocations and regulatory action for low-data-rate non-geostationary systems, including 2010–2025 MHz. Agenda item 1.13, under Resolution 253 (WRC-23), studies possible MSS allocations for direct connectivity between space stations and IMT user equipment. Agenda item 1.14, under Resolution 254 (WRC-23), studies possible additional MSS allocations. These are study mandates. None has yet altered the international allocation or decided the future United Kingdom use of the consultation bands.

Standardisation is necessary but not sufficient

3GPP introduced the first normative non-terrestrial network requirements in Release 17. The current ETSI publication of TS 138 101-5 identifies NR operating band n256 with the same 1980–2010 MHz uplink and 2170–2200 MHz downlink pairing. Those facts increase the strategic relevance of the band. They do not establish how many compatible devices are available, which features they implement, whether satellite and terrestrial equipment can support a particular sharing configuration, or the date on which a commercially scalable service will be ready.

Ofcom should therefore request evidence at successive levels: standard specification, implemented chipset, certified device, payload capability, integrated end-to-end testing, coordination completion and scalable service readiness. A claim at one level should not be treated as proof of the next.

Responses to consultation questions

Question 1 — Short-term policy approach

Direct answer: Ofcom should adopt its third short-term option: provide both incumbents with bounded transitional authorisations, while retaining the ability to authorise additional users where the statutory and technical tests are satisfied. The bridge should last three years, not five, and should not prejudice the long-term model.

Immediate clearance and fallowing would sacrifice existing consumer and business value without showing that an alternative service could use the bands sooner. It could also weaken resilience and create migration costs. A bridge is therefore justified.

Ofcom has not overlooked a wholly separate short-term option that is clearly superior on the present evidence. The useful refinement is to make the third option a staged, evidence-led transition with an additional-access route and a hard decision timetable, rather than to create a fourth authorisation category.

However, continuity should not become automatic incumbency. The authorisations should say expressly that they confer no preference in a future award, no expectation of renewal and no exclusivity beyond the precise legal effect of their conditions. Ofcom should publish a programme that works backwards

from the expiry date: evidence refresh, preferred long-term approach, detailed technical and award design, final decision, implementation and any migration.

The option should be refined as a staged transition with evidence checkpoints. At a minimum, Ofcom should publish annual information on material changes in use, additional-access activity, standards and equipment maturity, international developments and progress towards the long-term decision. Publication may be aggregated where confidentiality or security requires it.

Illustrative scenario 1 — Early European outcome. If the European Union adopts and implements a stable band plan early in the bridge, Ofcom can consult on aligning relevant technical and equipment dimensions without treating the EU operator-selection mechanism as binding in the United Kingdom.

Illustrative scenario 2 — European delay. If the EU legislative or implementation process slips, the United Kingdom timetable should continue. The existence of an unresolved proposal should not produce an open-ended incumbent extension.

Illustrative scenario 3 — Changed European design. If the final EU model differs materially from the Commission proposal, Ofcom should compare the final design with United Kingdom objectives rather than align with an obsolete draft.

Illustrative scenario 4 — WRC-27 evidence. If WRC-27 produces relevant international changes, Ofcom should incorporate them through a published evidence update. Preparatory studies before the conference should not be presented as final outcomes.

Illustrative scenario 5 — Implementation overrun. If Ofcom has decided the long-term model but it cannot be operational by the bridge expiry, any short, targeted contingency should be separately reasoned, limited to what is necessary and subject to consultation where required. It should not be assumed in the initial instrument.

Question 2 — New authorisations for the current operators

Direct answer: Yes, subject to strict qualification. Ofcom should provide new, time-limited authorisations to the two current operators from 14 May 2027 to preserve continuity, but those instruments should be legally and economically distinct from a long-term allocation.

The authorisations should identify the responsible legal entity, frequencies, services and apparatus covered. They should require prompt notification of material changes, including ownership or control, operating architecture, satellite or filing dependency, coordination arrangements and substantial cessation or reduction of use. Ofcom can then consider whether a variation, consent or other action is necessary under the applicable instrument and the Wireless Telegraphy Act 2006.

The fact that a business acquires an incumbent operator, obtains an overseas regulatory approval or acquires an interest associated with an ITU filing does not itself give it authority to establish, install or use wireless telegraphy apparatus in the United Kingdom. Nor does the seniority of a filing answer Ofcom's competition or consumer-interest questions. The legal instruments should make that separation operationally clear.

The package should not attempt to freeze current corporate structures. It should instead make the authorised entity accountable and give Ofcom visibility of material change. Proportionate continuity conditions can protect users while allowing legitimate technical and corporate evolution.

Illustrative scenario 6 — Change of control. If an incumbent undergoes a change of control during the bridge, service may continue only under the existing United Kingdom instrument unless and until Ofcom determines that a variation, transfer or other regulatory step is required. The transaction alone does not rewrite the authorisation.

Illustrative scenario 7 — Filing acquisition without national right. If a new owner obtains control of a senior ITU filing, that may affect international coordination but does not create a United Kingdom licence or exemption.

Question 3 — Length of the short-term period

Direct answer: Three years is preferable to five.

Three years is long enough to avoid a cliff edge, gather focused evidence and complete a United Kingdom process if Ofcom begins promptly. Five years would increase the risk that a transitional arrangement becomes the de facto long-term allocation, particularly where equipment ecosystems, European legislation and satellite plans are evolving.

The three-year period should have a fixed end date. Ofcom should not imply an automatic extension. Any later proposal to extend should identify the event that prevented implementation, the minimum necessary duration, the effects on prospective entrants and consumers, and the measures used to preserve competition and optionality.

Ofcom should publish milestones soon after its short-term decision. Indicatively, these should cover data requests and market engagement in the first year; a preferred long-term approach and technical work programme by the middle of the bridge; and sufficient time for a final decision, authorisation process and migration before expiry. These are governance milestones, not invented engineering lead times.

Illustrative scenario 8 — Early migration. If an incumbent's aeronautical or other service can migrate earlier than expected, Ofcom should consider whether the released capacity can support additional access rather than leave it unused until the planned operational endpoint of the bridge.

Illustrative scenario 9 — Late migration claim. If an operator later says migration requires longer than the bridge, Ofcom should require verifiable evidence on dependencies, alternatives, cost and critical users. An unsupported timetable should not determine the public allocation.

Question 4 — Proposed multi-instrument implementation

Direct answer: Yes. Ofcom should proceed with a coordinated package consisting of an amended terminal exemption, new fixed-term CGC licences and continued Aircraft Radio licensing where the existing route remains fit for purpose.

The 2016 exemption should be amended to specify clearly the frequencies applicable to each operator and remove obsolete references to the former European selection framework and the 2010 Regulations.

Precision is important because the present exemption names operators but does not divide the paired frequencies between them. The amendment should avoid accidentally enlarging either operator's position.

New CGC licences should contain a common fixed expiry date. The amended terminal exemption should be coordinated to the same operational endpoint, recognising that exemption regulations require the applicable statutory amendment or revocation process rather than expiring as a licence does. If both operators are eligible for a CGC licence, the conditions should state the frequencies, sites or deployment controls, coordination duties, notification requirements, records and enforcement responsibilities. Existing Aircraft Radio licences may continue if their conditions remain consistent with the new package; Ofcom should verify the interfaces rather than assume that no consequential amendment is needed.

Ofcom should publish a short responsibility map showing which person is accountable for terminal compliance, satellite operations, CGC activity, aircraft equipment, interference reporting, change notification and transition-out. This is especially important if terminals are licence-exempt: exemption removes the need for an individual licence but does not remove the need for enforceable parameters and identifiable operational responsibility elsewhere in the system.

The instruments should be synchronised and include:

- a coordinated operational endpoint, using the legally applicable expiry or amendment/revocation mechanism for each instrument, and an explicit non-prejudice clause;
- the authorised frequencies and apparatus or service scope;
- a proportionate material-change notification duty;
- cooperation with Ofcom-led interference investigation and coordination;
- records adequate to verify compliance and material use;
- a transition plan and contacts for service-continuity incidents; and
- a mechanism for Ofcom to address harmful or undue interference using its statutory powers.

Illustrative scenario 10 — Architecture change. If an operator replaces a satellite, gateway route or CGC architecture in a way that materially changes the interference environment, the exemption should not silently absorb that risk. A notification and, where appropriate, licence variation should precede the change.

Illustrative scenario 11 — Uneven use. If one incumbent's actual use becomes substantially lower while the other remains active, the bridge conditions and additional-access process should allow Ofcom to examine the newly available opportunity without treating nominal assignment as conclusive.

Question 5 — Standalone satellite-operator licence alternative

Direct answer: Ofcom should not prefer a standalone satellite-operator licence at this stage. It should retain that model as a possible fallback or long-term component if evidence shows that the licensee can exercise effective control over the relevant terminals and the model creates clearer accountability than the proposed multi-instrument package.

A single licence covering terminals and CGC activity could, in principle, simplify responsibility, facilitate trading and place obligations on an identifiable satellite operator. But the consultation correctly identifies a workability question: whether the operator has sufficient operational and contractual control over all terminals whose use the licence would authorise. That issue is particularly important for mass-market or roaming devices.

The alternative also raises procedural and design questions if an exclusive licence is contemplated. The statutory tests and notice requirements for exclusive licences must be satisfied; exclusivity should not be assumed merely because the instrument is administratively convenient. A standalone licence does not itself resolve international coordination, coexistence or competition.

Before adopting this route, Ofcom would need evidence on terminal activation and deactivation, network access control, compliance monitoring, roaming, third-party distribution, firmware or configuration changes, incident response and the enforceability of operator obligations down the supply chain. Without that evidence, the proposed exemption-plus-licence package is the safer bridge.

Illustrative scenario 12 — Controllable closed fleet. A satellite operator serving a closed, contractually controlled device fleet may be able to demonstrate end-to-end compliance control. A standalone licence could then improve accountability.

Illustrative scenario 13 — Open consumer ecosystem. Where many consumer devices can roam or connect through third parties, the nominal satellite operator may not control every relevant parameter. In that case, placing all terminal responsibility in one licence may look simpler than it is.

Question 6 — CGC fees

Direct answer: Ofcom should retain the existing CGC fee structure for the transitional licences rather than waive fees. It should not introduce a speculative numerical administrative incentive pricing charge without the evidence and consultation needed to support it.

The bridge is designed to preserve existing use while the long-term framework is developed. Retaining the present fee structure minimises an unnecessary discontinuity and avoids creating a short-term windfall. A blanket waiver would reduce the signal that licensed CGC access remains a regulated use of scarce spectrum and could weaken incentives to release unused capacity.

The licence-exempt treatment of qualifying user terminals can remain free of individual licence fees. That is a distinct question from the fee for CGC licences. Ofcom should state the cost-recovery or spectrum-management basis for the transitional CGC fee and ensure it is proportionate to the limited term.

Long-term fees should be decided with the long-term authorisation model. If Ofcom later considers administrative incentive pricing, it should assess opportunity cost, spectrum availability, technical constraints, international coordination, alternative uses, competition and the risk of deterring socially valuable services. Ofcom's cost-based fee framework and its satellite gateway fee work provide relevant methods by analogy, but neither supplies a ready-made numerical answer for these bands.

Question 7 — Additional users during the transitional period

Direct answer: Yes. Ofcom should be able to authorise additional users during the bridge when it is satisfied, on evidence, that the proposed use is legally eligible, technically feasible, enforceable and unlikely to cause undue interference. Direct Ofcom licensing should be the default route for commercial or beta access. Amendment of the exemption should be reserved for a mature, homogeneous class of low-risk use.

An additional-access process should be open, criteria-based and proportionate. It should invite an applicant to describe the requested frequencies, geography, service, network architecture, terminal population, traffic assumptions, orbital and gateway dependencies, international coordination status, interference analysis, mitigation controls, deployment milestones, change-management process and exit arrangements. The level of evidence should reflect the scale and risk of the proposal.

Direct licensing has four advantages at this stage. It identifies the accountable person; permits tailored and enforceable conditions; allows a defined duration and expiry; and makes later variation or revocation more tractable. A limited-frequency, limited-area or time-limited commercial authorisation may be appropriate where the evidence supports that boundary. Ofcom's Innovation and Trial licensing can support genuine research and restricted testing, subject to its own terms, but should not be used to bypass the conditions appropriate to a commercial service.

The existing Local Access licensing model is at most a procedural analogy: it demonstrates that access requests can be bounded and coordinated, but it concerns different terrestrial spectrum, relies on particular incumbent arrangements and does not prove satellite coexistence. Ofcom should design a 2 GHz MSS process for the actual technical and legal problem.

An exemption amendment may later be efficient where all compliant devices share stable parameters and individual licensing would add little. It is less suitable for a first-of-kind deployment with bespoke orbital, beam, power, geographic or coordination features because the exemption must define a general class and offers less granular control.

Incumbents should provide relevant, reasonably necessary technical information under confidentiality protections where justified. Ofcom should manage the domestic authorisation process and make the regulatory decision. Incumbent agreement may be useful evidence of coordination, but should not operate as a separate veto over Ofcom's domestic decision. This is without prejudice to applicable ITU coordination requirements, higher-priority filing protections and any bilateral coordination arrangements needed for the proposed service.

The Radio Spectrum Policy Group has observed that co-frequency, co-coverage operation for small earth stations is generally difficult because antenna discrimination may be insufficient, while recognising that particular time-sharing concepts may be possible in some internet-of-things cases. That is a caution about the need for configuration-specific evidence, not a universal finding that all sharing is impossible or possible.

Illustrative scenario 14 — Narrowband internet-of-things proposal. An applicant requests a small channel with controlled duty cycle and provides measurements and a coordination plan. Ofcom can assess that specific configuration; the small bandwidth alone does not prove compatibility.

Illustrative scenario 15 — Geographic beta deployment. An applicant proposes a geographically bounded commercial beta with defined devices, users and expiry. A direct licence can contain the boundary and require reporting before expansion.

Illustrative scenario 16 — Standardised but unavailable devices. A band is specified in an ETSI/3GPP standard, but compatible devices are not commercially available at the required scale. Ofcom should treat the standard as enabling evidence, not proof of service readiness.

Illustrative scenario 17 — Ready devices but incomplete coordination. Devices and a satellite payload are available, but international and domestic coordination is incomplete. Readiness in the equipment chain does not remove the coordination requirement.

Illustrative scenario 18 — Research trial becoming commercial. A limited trial succeeds and the applicant wants to add ordinary paying users. Ofcom should require the appropriate commercial authorisation rather than allow a trial licence to expand by practice.

Illustrative scenario 19 — Unsupported sharing model. Two applicants agree in principle to time sharing but cannot demonstrate synchronisation, failure handling or aggregate interference. Contractual willingness does not establish technical feasibility.

Question 8 — Other short-term implementation considerations

Direct answer: Ofcom should add explicit non-prejudice, a coordinated operational endpoint, proportionate reporting, material-change notification, transition planning and contingency provisions.

The key implementation measures are:

1. **Non-prejudice.** No bridge authorisation, additional-access licence, filing position or coordination agreement should create a presumption in the long-term selection.
2. **Coordinated operational endpoint.** Terminal exemptions, CGC licences and any associated permissions should be mapped to prevent accidental gaps or overhangs. The instruments may require different legal mechanisms to reach that endpoint: a fixed licence expiry is not the same as amendment or revocation of exemption regulations.
3. **Light but useful reporting.** Ofcom should collect data necessary to understand material use, service dependency, interference events, coordination and transition readiness. It should avoid burdensome routine reporting that does not affect a decision.
4. **Material-change control.** Operators should notify changes that could affect compliance, interference, competition, ownership accountability or service continuity.
5. **Transition planning.** Each operator should identify dependencies and practical exit or migration steps. Commercially confidential details can be protected without making the public timetable opaque.
6. **Contingency discipline.** Ofcom should identify what happens if the long-term framework is not ready, but should not pre-authorise an extension. A contingency decision should be event-specific and time-limited.

7. **Publication and reasons.** Decisions on additional access, including refusals, should be explained at a level consistent with confidentiality and security. Transparent criteria will reduce perceptions that incumbency controls entry.
8. **Enforcement interface.** The responsibility map should explain how Ofcom will receive and investigate interference reports where one part of the system is exempt and another is licensed.

Illustrative scenario 20 — Partial-frequency opportunity. Evidence shows a frequency segment can support a bounded new use without affecting protected incumbent operations. Ofcom should be able to license that segment without waiting for complete band redesign.

Illustrative scenario 21 — Long-term decision before expiry. Ofcom completes the long-term selection early. The bridge should remain only for the period needed for orderly implementation, subject to the terms and statutory powers applicable to the instruments; it should not automatically run for its maximum duration if an earlier transition is lawful and proportionate.

Question 9 — Assessment of long-term approaches

Direct answer: Each approach has a legitimate policy logic, but none is sufficient on its own. Approach A is coordination-led but risks entrenching filing seniority; Approach B offers continuity and tradability but may entrench concentration; Approach C provides the strongest United Kingdom control and competitive opportunity but requires credible technical prerequisites; and Approach D offers scale and cross-border benefits but must be assessed dimension by dimension and remains exposed to external timing.

Approach A — Minimal intervention and reliance on ITU filings

This approach may reduce international coordination friction because applicants with relevant filings or agreements may be better positioned to operate. It could also reduce the risk of awarding a national right that cannot be implemented internationally.

Its weakness is that filing priority and national public-interest allocation are not the same question. A filing is part of the international notification and coordination system. It is not a United Kingdom licence and does not determine competition, consumer value, resilience or spectrum-efficiency outcomes. Reliance on senior filings may tend towards a single effective user even where the United Kingdom would benefit from another structure. Ofcom would still need a national authorisation process, eligibility rules and enforceable conditions.

Approach B — Long-term rights for incumbents, with trading

This approach maximises continuity and may encourage investment by providing tenure. Tradability can permit rights to move if commercial incentives align, and it may reduce the need for Ofcom to predict every future business model.

Trading is not a complete competition or technical solution. A buyer still needs workable filing and coordination arrangements, and a bilateral transaction may be costly or unavailable. A concentrated incumbent may have little incentive to sell capacity to a rival. Ofcom would need initial spectrum caps or segmentation decisions, conditions on material use, transfer controls and a competition assessment. A

long licence should not be justified solely by the assertion that trading will correct an overly concentrated starting allocation.

Illustrative scenario 22 — Trade with unresolved filing. A buyer acquires a national licence but cannot complete the international coordination needed for service. The trade does not manufacture operational spectrum access.

Approach C — United Kingdom-led selection or award

A UK-led process best preserves control over competition, coverage, innovation, resilience and implementation conditions. It can be designed as a comparative selection, auction or another objective process consistent with the legal framework. It gives prospective entrants a defined route rather than requiring an incumbent transaction.

Its central challenge is that an award cannot manufacture technical usability. Ofcom should not select a bidder on ambitious service claims if it lacks credible access to a filing, satellite capacity, coordination path, equipment ecosystem or financing. Prequalification or evidence requirements may be needed. Award design must also recognise that different applications may need different bandwidths and that subdivision can impose coordination or guard-band costs. Those costs must be evidenced rather than assumed.

Approach D — Alignment with the European Union

Alignment can support device scale, roaming, cross-border coordination and investor certainty. It may be particularly valuable for band segmentation and technical conditions. The Commission's proposal also supplies a concrete model against which the United Kingdom can test its options.

Full replication may not maximise United Kingdom value. The EU proposal remains under negotiation, its timetable may not match the UK bridge, and some elements reflect EU institutional, security or market objectives. Ofcom should assess alignment separately for band plan, technical conditions, service classes, equipment, operator eligibility, selection, duration, security and timing. Selective alignment can deliver ecosystem benefits while preserving a UK-led decision.

Illustrative scenario 23 — Same band plan, different operators. The United Kingdom adopts technically compatible frequency blocks but selects operators through its own process. Equipment and coordination benefits can be retained without copying the EU allocation decision.

Illustrative scenario 24 — Multi-user segmentation cost. A proposed three-user structure appears competitive but requires separation that materially reduces usable capacity. Ofcom should compare measured or modelled costs with the competition benefit rather than assuming that more blocks are always better or worse.

International comparators reinforce the need to choose dimensions rather than import a package. Canada's 2026 preliminary consultation examines MSS developments across L- and S-band spectrum, while Saudi Arabia has used an auction route for non-terrestrial-network spectrum at 2100 MHz. Australia has explored an internet-of-things spectrum-park concept, as Ofcom notes. These examples show that consultation, competitive allocation and shared or segmented models are all possible

regulatory tools. Different national allocations, filing positions, incumbent services and legal powers mean that none supplies a ready-made answer for the United Kingdom.

Question 10 — Preferred long-term approach

Direct answer: Ofcom should pursue a hybrid of Approach C and selective elements of Approach D: a UK-led, transparent selection and authorisation process, informed by and aligned with the final European technical and ecosystem framework where that produces demonstrable benefit.

The process should begin with a public objectives statement. It should identify the relative weight given to optimal spectrum use, consumer benefits, competition, service continuity, innovation, investment, resilience, coverage, security and international coordination. Ofcom should then determine whether a band-wide or segmented model can meet those objectives, using engineering and market evidence.

The preferred route should include:

- a United Kingdom decision on eligible services, applicants and spectrum blocks;
- objective prequalification evidence on filings or coordination paths, payload and device readiness, financing and delivery;
- transparent competition analysis and, if necessary, spectrum caps or other safeguards;
- technically justified block sizes and separation arrangements;
- licence terms long enough to support efficient investment but coupled with milestones, material-change notification and proportionate use conditions;
- a carefully designed trading regime that does not bypass competition, coordination or control reviews;
- selective alignment with European band and technical arrangements when benefits exceed transition and opportunity costs; and
- a timetable that can absorb final EU and WRC-27 evidence without surrendering control to indefinite delay.

Ofcom should publish a decision tree for international dependencies. For example, if the EU model is final by a specified checkpoint, assess defined alignment dimensions; if it is not, proceed with a UK baseline that preserves later interoperability where feasible. If WRC-27 produces relevant decisions, incorporate them; if not, continue under the then-applicable international framework.

The authorisation mechanism and coexistence design should be settled together but not confused. A competitive award could select among technically feasible proposals; it cannot transform an infeasible configuration into a usable one. Conversely, an engineering coordination agreement does not establish that the resulting market structure serves citizens and consumers.

Question 11 — Further evidence for the long-term decision

Direct answer: Ofcom should obtain a structured evidence package covering equipment, payloads, services, coordination, competition, alternatives, resilience, transition, fees, ownership and the wider MSS landscape. It should publish non-confidential results and identify uncertainty explicitly.

The following evidence is needed.

Standards, equipment and deployment

- Current 3GPP and ETSI status, including precisely which n256 functions and device classes are normative.
- Chipset and device implementations, certification, volumes, power and antenna constraints, roaming and activation controls.
- Satellite payload capability, launch and deployment dependencies, gateway arrangements and end-to-end test evidence.
- A staged readiness assessment distinguishing a paper standard from prototype, certified product, operational network and scalable service.

Coexistence and coordination

- Reproducible link and interference analyses for the actual proposed configuration, with assumptions, uncertainty and sensitivity tests.
- Aggregate effects of terminal populations, traffic distributions, beam plans, CGCs, adjacent-frequency operations and failure modes.
- Domestic and international coordination dependencies, including the relevant filing role and status without equating it to national authorisation.
- Mitigation controls, monitoring, incident response and the consequences of later architecture changes.

Demand, competition and economic value

- Evidence of United Kingdom demand by service, geography and user group rather than global forecasts alone.
- The minimum and preferred bandwidth for each application, with transparent performance trade-offs.
- Alternatives and substitutability, including other MSS bands, terrestrial mobile, Wi-Fi, fixed connectivity and hybrid services. The CMA's Viasat/Inmarsat analysis may inform the in-flight-connectivity market context, but it should not be used as proof that spectrum bands are technically substitutable.
- Effects on entry, wholesale access, concentration, innovation and consumer choice under each allocation structure.

- Valuation evidence suitable for an award or fee decision, including uncertainty and non-market public value.

Public interest, resilience and transition

- Existing user dependency, particularly where service supports remote, safety-related or resilience functions.
- Coverage claims, service quality, outage implications and credible contingency routes.
- Migration feasibility, cost, lead-time dependencies and distribution of costs among operators and users.
- Security, supply-chain and lawful-interference implications, assessed by the competent authorities.

Governance and ownership

- Current and prospective ownership and control, material transactions and the accountable UK-authorized entity.
- Proposed licence duration, milestones, change control, trading and enforcement.
- Interaction with Ofcom's broader satellite and direct-to-device work. Ofcom's 900 MHz direct-to-device exemption framework, extended by amending regulations that came into force on 10 July 2026, shows that another model can operate through an MNO-satellite partnership, but that materially different frequency and technical setting should be treated as an analogy, not a template.

Ofcom should provide a common data template so that competing claims can be compared. Commercial confidentiality may justify redaction or aggregation, but it should not prevent Ofcom from publishing its methodology, principal assumptions, ranges and reasons.

Question 12 — Impact assessment and equality considerations

Direct answer: The impact assessment is directionally reasonable for choosing a short continuity bridge, but should be strengthened before the final decision. In particular, it should not assume that later additional access will fully mitigate competitive effects when the mechanism and feasible configurations have not yet been decided.

The assessment should add or deepen the following areas.

Dynamic competition and investment

The bridge gives incumbents continuity while prospective entrants face uncertainty. That asymmetry may affect financing, equipment commitments and negotiation leverage even if access is legally possible. Ofcom should compare a three- and five-year bridge, the timing of additional-access decisions and the risk that transitional investment creates a claim for further renewal.

Ownership and control

Material transactions may change incentives, market concentration, vertical relationships or service strategy during the bridge. The assessment should consider how notification, licence variation and competition safeguards respond, without assuming that an overseas approval determines the UK position.

Transition failure and option value

The assessment should model the cost of the long-term regime not being operational by expiry, the consequences of abrupt service cessation, and the value of retaining more than one feasible long-term route. A short bridge preserves flexibility only if the decision programme is adequately resourced.

Additional-access mitigation

Potential entry should be treated as a scenario, not a guaranteed benefit. The assessment should test direct licensing, exemption and no-feasible-access cases, taking account of engineering evidence, coordination timing and the applicant's delivery readiness.

Consumers, rural users and service dependency

Ofcom should identify affected user groups and service contexts, including remote and rural users, aeronautical connectivity and resilience applications. It should distinguish inconvenience, economic loss and safety or resilience effects. Claims should be evidence-based and avoid treating all satellite connectivity as critical.

Equality and accessibility

The equality assessment should consider whether disruption, price, equipment replacement or coverage changes disproportionately affect disabled people, older people or people in remote communities. It should also consider accessible communication of service changes. This does not imply a predetermined equality effect; it identifies the evidence that should be tested.

Sensitivity and distribution

The final assessment should show sensitivities for bridge length, service growth, additional entry, migration cost, international delay and equipment readiness. Costs and benefits should be separated by operator, prospective entrant, consumer, public body and Ofcom where practicable. Aggregate net benefit can conceal concentrated harm or barriers to entry.

These additions would improve proportionality and transparency. They are recommendations for a more decision-useful assessment, not an allegation that the present consultation is unlawful.

Consolidated recommendations

Ofcom should:

1. authorise the two current operators for a fixed three-year transition from 14 May 2027;

2. state that the bridge confers no renewal preference, exclusivity beyond its precise terms or long-term entitlement;
3. implement a coherent package of a precisely amended terminal exemption, fixed-term CGC licences and verified Aircraft Radio arrangements;
4. coordinate the operational endpoint of the instruments using the legally applicable expiry or amendment/revocation mechanisms, and publish a responsibility map, evidence timetable and transition milestones;
5. retain the existing CGC fee structure initially and decide long-term pricing with the long-term framework;
6. permit evidence-supported additional access, using direct licensing as the default for early commercial or beta deployments;
7. use exemptions only for a mature and homogeneous low-risk class, and Innovation and Trial licences only within their proper limited purpose;
8. require incumbents to provide necessary coordination information without giving them a separate veto over Ofcom's domestic authorisation decision, while preserving applicable ITU coordination dependencies;
9. select the long-term model through a UK-led process with selective European technical and ecosystem alignment;
10. treat ITU filings, EU proposals, WRC studies and technical standards according to their actual legal and evidential status;
11. obtain comparable evidence on devices, payloads, coordination, demand, competition, resilience, ownership and transition; and
12. expand the final impact assessment to cover dynamic competition, additional-access uncertainty, ownership changes, transition failure, distributional effects and option value.

Annex A — Transitional lifecycle

This annex is an implementation aid, not a proposed statutory procedure.

Stage	Ofcom action	Operator or applicant evidence
Short-term decision	Confirm three-year bridge, instruments, criteria and timetable	Correct legal entity, frequencies, services and dependencies
Instrument preparation	Amend exemption; issue aligned CGC licences; verify aircraft interfaces	Control arrangements, compliance contacts and material-change process
Bridge commencement	Publish responsibility map and non-prejudice statement	Operational confirmation and transition baseline
Additional-access window	Publish criteria; receive and assess bounded applications	Configuration-specific coexistence, coordination and delivery evidence
Evidence refresh	Update standards, devices, market, filings, EU and WRC evidence	Comparable data using common templates
Long-term design	Consult on objectives, technical structure, selection and conditions	Deliverability, competition, financing, resilience and transition plans
Selection and implementation	Decide, authorise, coordinate and manage migration	Final compliance and readiness evidence
Bridge expiry	End, vary or replace transitional instruments in accordance with law	Orderly migration or cessation; no assumed extension

Annex B — Additional-user decision aid

This decision aid is illustrative. It does not replace Ofcom’s statutory duties, engineering judgement or the terms of an application process.

Question	Evidence expected	Possible regulatory implication
Is the activity research or tightly limited testing?	Defined participants, area, frequencies, duration and non-commercial scope	Consider Innovation and Trial licensing under its applicable conditions
Is it a bounded commercial or beta service?	Responsible entity, operational controls, coexistence, coordination and exit plan	Prefer a tailored direct licence
Is the device class homogeneous and low risk?	Stable technical parameters, scalable compliance and low individual-control value	Consider a future exemption amendment
Can coexistence be demonstrated for the actual configuration?	Reproducible analysis, assumptions, sensitivities, aggregate effects and mitigation	Proceed to authorisation assessment; impose conditions as needed
Is evidence incomplete but remediable?	Identified gaps, test plan and bounded risk	Seek further information or authorise a narrower trial
Would the proposal depend on incumbent consent?	Coordination needs and information asymmetry	Ofcom manages the domestic assessment; incumbent supplies information without a separate domestic veto; ITU coordination dependencies remain
Has a material feature changed after authorisation?	Updated architecture, ownership, device, payload, geography or traffic evidence	Notification, reassessment or variation may be required

Annex C — Long-term option comparison

Approach	Principal strength	Principal risk and necessary control
A: filings-led/minimal intervention	May reduce international coordination friction	Filing seniority may entrench one user; retain national authorisation, competition and public-interest assessment
B: incumbent long-term rights with trading	Continuity, investment certainty and possible market reallocation	Concentration and transaction barriers; trading does not solve filings or coordination
C: UK-led selection or award	Strong control over competition, value, conditions and entry	Award cannot create technical feasibility; require credible readiness and coordination evidence
D: EU alignment	Equipment scale, interoperability and cross-border coordination	Proposal and timetable remain external; assess alignment dimension by dimension
Recommended hybrid	UK-led selection plus selective EU technical/ecosystem alignment	Needs an explicit timetable, dependency rules and evidence-based licence design

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