

Supplementary Comments from Kinéis on MSS-IoT Spectrum Availability in the United Kingdom

18 August 2026

*This supplementary statement is submitted by Kinéis in support of, and in addition to, the joint response submitted by Kinéis and Open Cosmos to Ofcom's consultation **Future use of 2GHz MSS: proposals for the use of 1980–2010 MHz and 2170–2200 MHz from May 2027**, published on 16 June 2026. This statement is non-confidential and may be published in full.*

Kinéis fully endorses the joint response submitted together with Open Cosmos and wishes to provide the following additional observation based on its direct experience as an MSS-IoT operator.

Ofcom notes that alternative spectrum bands are available for IoT services, including MSS allocations below 1 GHz. While such allocations remain important for existing MSS-IoT operations, Kinéis' experience demonstrates that their existence does not necessarily translate into practical market access.

Kinéis has sought access to the **UHF MSS band in the United Kingdom since 2021** and has consistently highlighted the need for an operational authorisation framework through consultation responses and engagement with UK authorities. To date, no operational authorisation framework has been established that would enable Kinéis to provide services in this band in the UK.

This experience highlights the distinction between spectrum that is available in principle and spectrum that is effectively available for operational MSS-IoT services. It also demonstrates that future demand for MSS-IoT connectivity should not be assessed on the assumption that existing VHF/UHF MSS resources provide a sufficient or readily accessible alternative to future access in the 2 GHz MSS band.

For these reasons, Kinéis considers that access to the 2 GHz MSS band should be viewed as a necessary complement to existing MSS-IoT spectrum resources. As set out in the joint Kinéis/Open Cosmos response, Ofcom should recognise MSS-IoT as a distinct service category, establish a dedicated shared **2×5 MHz MSS-IoT allocation** capable of expanding with demonstrated demand, provide meaningful access opportunities from 2027 onwards, and regard any future access to guard-band resources only as a supplementary capacity mechanism rather than a substitute for dedicated MSS-IoT spectrum access.

Kinéis would be pleased to provide further information to Ofcom, if helpful, regarding its experience seeking access to MSS-IoT spectrum resources in the United Kingdom and the role that future 2 GHz MSS access could play in supporting continued growth of satellite IoT services.