

Your response

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Question 1: Do you have any views on the options for managing the 2 GHz MSS band after 13 May 2027? Are there any options that Ofcom has overlooked?	Confidential? – N Lacuna Space considers a three-year transition period to be a reasonable approach for managing the 2 GHz MSS band after 13 May 2027. We agree that a premature long-term authorisation may not be in the interests of spectrum users, particularly if the future UK framework is not aligned with regulatory and market developments elsewhere in Europe. However, we believe that Ofcom should use the transition period not only to maintain existing services, but also to enable access for additional spectrum users beyond the two current licence holders, particularly in parts of the band that are currently under-utilised. Lacuna Space is already technically and commercially equipped to provide services in the 2 GHz MSS band. There is already clear and growing demand for IoT services that could benefit from access to the 2 GHz MSS band. The UK LoRaWAN market was estimated to generate revenues of US\$17.1 million in 2025 and is projected to reach US\$108.32 million by 2033¹. Satellite-IoT connectivity based on technologies such as LoRaWAN can support important UK industries, including agriculture and water management, through applications such as water quality and level monitoring, soil condition monitoring, and soil moisture monitoring. These applications are particularly relevant given the scale and importance of these sectors. In 2024, agricultural land accounted for approximately 17 million hectares, or 69% of the UK's total land area, while the sector contributed £14.5 billion to the UK economy². Similarly, water companies in England abstracted an average of 14,637 million litres of water per day from the environment between 2024 and 2025, while 3.8% of water was lost or used in operations before entering the

¹ [“UK LoRaWAN LoRa Module Market Size and Share 2026 to 2033”](#), Reports Insights, Accessed: 12 August 2026.

² [“Research and analysis – Farming evidence - key statistics”](#), GOV-UK, 23 October 2025, Accessed: 12 August 2026.

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	supply network³. The importance of efficient resource monitoring is further highlighted by the drought conditions experienced across large parts of England in 2026⁴. Low-power Satellite-IoT is well suited to supporting these types of applications, particularly in remote or difficult-to-reach areas where terrestrial connectivity may be limited. Lacuna Space already serves such use cases in the 862-870 MHz band and could benefit from access to additional spectrum in the MSS S-band, including on a temporary basis. We already work with partners through which comparable services could be offered to customers in the UK, as we do in other regions of the world. We therefore propose that Ofcom use the transition period as an opportunity to permit temporary access to under-utilised portions of the 2 GHz MSS band for additional users and emerging services, subject to appropriate technical and regulatory conditions. This could include shared, unprotected, or non-interference-based access models where technically feasible. Such an approach would help ensure that the spectrum does not remain under-utilised during the transition period, while supporting innovation, market development, and competition. It would also allow emerging technologies and services to demonstrate their technical and commercial viability, providing Ofcom with a broader evidence base to inform its long-term approach to the 2 GHz MSS band after the transition period.
Question 2: Do you agree with our proposal for a short-term transition period, which authorises Viasat and EchoStar? Please set out your reasoning.	Confidential? – N We agree that it makes sense to support existing use cases instead of clearing the spectrum. However, we do not believe the spectrum is currently being utilised to its full potential.

³ [“Research and analysis – Water resources 2024 to 2025: analysis of the water industry’s annual water resources performance”](#), GOV-UK, 18 November 2025, Accessed: 12 August 2026.

⁴ [“Press Release - Drought declared in half of England”](#), GOV-UK, 29 July 2026, Accessed: 12 August 2026.

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	We would not support an approach that gives the two existing licence holders a privileged opportunity to prepare for future use cases that could later provide them with a competitive advantage over other operators that have not been given an equal and fair opportunity to access the spectrum. Therefore, while existing use cases could continue to be supported, other operators should also be given a fair opportunity to make use of the spectrum during the same period, particularly where there is clear evidence of existing demand and commercial readiness of other operators. As mentioned before, Lacuna Space is already technically and commercially equipped to service customers, e.g. in the fields of water quality monitoring or smart agriculture. One way to enable this extended use of the spectrum could be through commercial sandboxes during the transition period.
Proposal for interim transition period	
Question 3: Do you agree with our preferred option for the duration of the proposed interim authorisation to be a three-year fixed period? Please set out your reasoning.	Confidential? – N We believe that a three-year period is more reasonable than a five-year period.
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.	Confidential? – N We believe that the limited duration of a transition period would not provide sufficient commercial justification for significant investment in licences. Instead, we propose that Ofcom use the transition period as an opportunity to foster innovation and assess the feasibility of new regulatory and/or technical approaches. The potential longer-term benefits of identifying such pathways could, in our view, justify the additional regulatory burden involved.

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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.	Confidential? – N The 2 GHz MSS spectrum has remained underutilised during the current authorisation period. Continuing to grant exclusive licences to only two licence holders could further limit effective spectrum utilisation and restrict opportunities for other services and users.
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.	Confidential? – N Lacuna Space proposes that parts of the 2 GHz MSS spectrum be temporarily made available on an unprotected, non-interference basis, subject to clearly defined technical and operational conditions, similar to the approach taken in UK IR 2030. Such a framework would not necessarily require high licence fees, particularly where access is granted only for a limited interim period.
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.	Confidential? – N Lacuna Space agrees with the proposal to enable additional users to access the spectrum during the interim period. Certain technologies may also be able to share portions of the spectrum efficiently. In the case of low-power satellite IoT applications, such as those based on LoRaWAN, access could potentially be enabled on a licence-exempt basis under a framework similar to that set out in ECC Decision (25)02⁵.
Question 8: Do you have any other views on the details of our proposal to authorise Viasat and EchoStar during the interim period?	Confidential? – N A transition period should be used to foster innovation among both incumbent and new spectrum users.
Proposals for deciding on our longer-term approach to 2GHz MSS	

⁵ [“ECC Decision \(25\)02](#) – Low power devices communicating with satellites (LPD-S) within the frequency range 862-870 MHz”, CEPT Electronic Communications Committee, 25 June 2025, Accessed: 13 August 2026.

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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?	Confidential? – N Ultimately we support an approach that is as much as possible harmonised with the EU approach, as long as the UK national interest is sufficiently reflected.
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.	Confidential? – N We continue to believe that the band should be subdivided into spectrum for exclusive use, as is currently the case, and spectrum designated for shared use, for example for low-power IoT deployments, similar to the approach in the 862–870 MHz band. As little as 1 MHz of spectrum could be sufficient for such applications, provided that appropriate and clearly defined operational limits are established. In addition, licence holders should be required to meet defined deployment and/or utilisation milestones. This would help prevent the level of under-utilisation observed during the current authorisation period and reduce the risk that inefficient spectrum use constrains innovation and competition.
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?	Confidential? – N Lacuna Space believes that Ofcom should take into account the strong and growing demand for low-power satellite IoT services, including those based on technologies such as LoRaWAN, when developing its long-term vision for the 2 GHz MSS band. The short-term authorisation period could provide an opportunity to assess the market and technological development of emerging technologies and new spectrum users within the band. This would help Ofcom build a stronger evidence base, reduce regulatory uncertainty, and support a more efficient and optimal long-term use of the spectrum.
Question 12: Do you have any comments on the Impact Assessments?	Confidential? – N

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	As expressed in our previous responses, Lacuna Space supports the efficient use of spectrum and agrees that the 2 GHz MSS band should not remain underutilised. By deferring a long-term decision until 2027 and allowing consideration of additional spectrum users during the interim period, Ofcom can create an opportunity for emerging services and technologies to develop, mature, and demonstrate their commercial and technical viability.