

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 Of the three broad options identified by Ofcom, a short-term extension of existing use is preferable to clearing the 1980-2010 MHz and 2170-2200 MHz (the “2 GHz MSS Bands”) or allowing this globally harmonised MSS spectrum to remain fallow. However, any extension should be narrowly tailored to its transitional purpose—preserving continuity of authorised services while Ofcom obtains greater clarity regarding the European Union (“EU”) framework, market demand, and service readiness before determining the optimal longer-term use of the band. Accordingly, transitional authorisations should not create de facto longer-term spectrum rights or confer a competitive advantage in the subsequent allocation process. In particular, an incumbent’s temporary authorisation should not be transferable, leased, sub-leased, assigned, or otherwise made available as a means for another operator to establish a materially new commercial service during the transitional period. Such safeguards would preserve the status quo that justifies transitional relief while ensuring that the ultimate opportunity to compete for this spectrum remains open and meaningful. Ofcom should also consider a transitional model that distinguishes between continuity of incumbent services and access by prospective new users. Under this approach, incumbent operators could continue authorised services during the transitional period, while any other operator seeking to trial or introduce a new use of the 2 GHz MSS Bands would obtain separate, time-limited access directly from Ofcom under objective, transparent, and non-discriminatory conditions, where such use would not cause undue interference to incumbent licensees. Importantly, such interim access should provide no preference, presumption of renewal, or other advantage in the eventual longer-term selection process. This approach would allow Ofcom to support innovation and more efficient spectrum use during the transition without permitting bilateral commercial arrangements involving existing rights to determine which prospective operator obtains an early mar-

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	ket position before the longer-term framework is established. In parallel, Ofcom should continue developing a competitive, technology-neutral longer-term framework so that the band is open to qualified MSS operators, including D2D providers, and so that the framework remains consistent with EU, technical, and market developments.
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 Lynk and Omnispace agree with Ofcom’s proposal for a short-term transition period authorising Viasat and EchoStar, subject to the safeguards discussed in response to Question 1. A limited transition is a reasonable means of preserving continuity of existing services, avoiding unnecessary disruption to consumers and businesses, and ensuring that the 2 GHz MSS Bands do not lie fallow while Ofcom obtains greater clarity regarding the EU framework, service readiness, and market demand. Ofcom appropriately proposes that the transitional authorisations be without prejudice to its longer-term decisions and provide no guarantee of continued access beyond the transition. Consistent with that purpose, the transitional authorisations should be narrowly tailored to continuation of existing spectrum use and should not create de facto longer-term rights or confer an advantage in the subsequent allocation process. In particular, consistent with the European Commission’s proposed approach for its own transitional period, the rights should not be transferable, leased, sub-leased, or otherwise used in a manner that circumvents those restrictions or prejudices the outcome of Ofcom’s longer-term selection process. These safeguards are especially important given the significant interest in the 2 GHz MSS Bands from prospective new entrants and emerging services such as D2D, and are consistent with a regulatory framework in which multiple Satellite Network Operators (“SNO”) can efficiently and effectively compete for access to the spectrum.
Proposal for interim transition period	

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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 Lynk and Omnispace do not agree that a three-year fixed period is necessary and instead recommend a two-year transitional period consistent with the European Commission’s proposed approach. The European Commission has proposed extending the incumbent operators’ existing rights for two years following their expiration in May 2027, after which the 2 GHz MSS Bands would transition to a new selection and authorisation framework. Aligning the UK transitional period with this timeframe would provide Viasat and EchoStar sufficient time to maintain continuity of existing services and undertake any necessary transition planning while avoiding an additional year of incumbent-only access in the UK after the corresponding EU transition is expected to conclude. This approach is particularly appropriate given the significant interdependence between UK and EU use of the 2 GHz MSS Bands and the regional nature of existing services. Although Ofcom considers three years to provide sufficient time for migration planning, the incumbents necessarily will need to prepare for the post-transition EU framework within the proposed two-year period in any event. Therefore, a two-year period better balances service continuity with the need to avoid unnecessarily delaying competitive access to the spectrum for new entrants and emerging MSS services, including D2D.
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 Lynk and Omnispace generally agree with Ofcom’s proposed approach to continue authorising existing use of the 2 GHz MSS Bands during the interim period through the CGC licence, licence exemption, and Aircraft Radio licence. Maintaining the existing authorisation mechanisms is a reasonable and proportionate means of preserving continuity of established services. For instance, a continued licence exemption for user terminals is consistent with the longstanding position of Lynk and Omnispace that regulators should avoid duplicative authorisations for devices operating within established technical parameters. Conversely, introducing a new licensing framework for a temporary, transitional period would be counterproductive.

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	Continuation of the existing framework should not expand the scope of the incumbents' transitional rights or prejudice Ofcom's longer-term allocation process. In particular, because the existing CGC licence permits concurrent trading, continuation of that mechanism should not be understood as permitting trading or other commercial arrangements that effectively provide another operator with the benefit of an incumbent's transitional spectrum rights in a manner that could establish a competitive advantage before Ofcom determines the longer-term framework. The interim authorisations should instead remain narrowly focused on continuity of existing services, with access by additional users addressed separately through the transparent and non-discriminatory mechanisms considered by Ofcom for the transitional period.
Question 5: Do you have any comments on the alternative approach we have considered, of licensing the satellite operators to use 2 GHz MSS during the interim authorisation period? If you have a preference for this approach, please set out your reasoning.	Confidential? – N The alternative approach creates a significant risk that temporary interim authorisations, especially if made tradeable, could confer durable competitive advantages before Ofcom determines the appropriate long-term framework for the 2 GHz MSS Bands. Under the alternative option, Ofcom would replace the existing framework with new stand-alone, exclusive licences for Viasat and EchoStar authorising both user terminals and CGC base stations, and proposes making those licences tradeable to promote competition and spectrum efficiency. In practice, however, trading an exclusive interim licence could allow another satellite operator to obtain the practical benefit of the incumbent's spectrum rights and establish commercial service, customers, partnerships, and market presence before additional prospective operators have an equivalent opportunity to seek access to the band. That concern is especially significant given the substantial current demand for 2 GHz MSS spectrum, the rapid development of D2D services, and the close interdependence between the UK and European markets. For instance, Ofcom identifies recent acquisitions of 2 GHz MSS spectrum rights as an important market development, while the European Commission's proposed two-year extension would expressly prohibit the incumbents from transferring, leasing, or sub-leasing their rights during that period. Accordingly, the interim period should preserve continuity of existing services without creating new tradeable

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	rights that could effectively determine competitive positioning before the longer-term process occurs. The existing authorisation mechanisms discussed in response to Question 4 better serve that limited purpose, while any access for additional users during the interim period should be provided separately by Ofcom on objective, transparent, and non-discriminatory terms rather than through trading of an incumbent's transitional authorisation.
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 Ofcom should not waive applicable fees during the interim authorisation period. Although the appropriate opportunity cost of the 2 GHz MSS Bands may be uncertain while the longer-term framework remains under consideration, Ofcom has identified substantial demand from prospective alternative users and acknowledges that setting fees too low or waiving them entirely could reduce the incentive for an incumbent to relinquish spectrum that could be used more efficiently by another operator. Providing exclusive transitional access without fees would be particularly inappropriate where the purpose of the interim period is limited to preserving continuity of existing services and should not confer additional competitive advantages on the incumbent operators. Accordingly, Ofcom should at minimum retain the existing fee framework during the transition rather than waive applicable fees. At the same time, interim fees should remain proportionate and should not be used as an auction-like mechanism or set at levels that divert resources from network investment and service deployment, particularly where Ofcom acknowledges that the spectrum's longer-term opportunity cost cannot yet be reliably determined.
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 Lynk and Omnispace support enabling additional users to access the 2 GHz MSS Bands during the interim period where such access can be accommodated without causing undue interference to incumbent services. Restricting the band solely to Viasat and EchoStar throughout the transition, despite demonstrated demand from additional MSS operators and emerging applications such as D2D, would

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	unnecessarily constrain competition, innovation, and efficient spectrum use. Ofcom itself recognises that access may be feasible through particular frequencies, geographic areas, or times and that its existing Innovation and Trial framework may be insufficient for operators seeking larger-scale beta or commercial services during the transition. This approach is consistent with facilitating competition among multiple SNOs and enables timely deployment of innovative MSS services. However, any such interim authorisation should be expressly time-limited and without prejudice to Ofcom's longer-term allocation process, providing no preference, renewal presumption, or other advantage when longer-term rights are ultimately determined. Ofcom's Option One—<i>i.e.</i>, direct authorisation of additional users by Ofcom for a specified period—is the preferable approach, because it provides an independent, transparent path to spectrum access rather than making a prospective entrant dependent on an incumbent's consent, concurrent trading rights, or other commercial arrangement. Ofcom proposes that such authorisations would be available where the additional use would not be expected to cause undue interference, which provides an appropriate technical safeguard while allowing Ofcom to evaluate prospective users on objective and non-discriminatory terms. Notably, direct operator access should not result in unnecessary individual licensing or duplicative approval of compliant end-user devices; where appropriate, Ofcom should extend the existing licence-exemption framework to terminals operating under an independently authorised additional user. This combination—<i>i.e.</i>, direct Ofcom authorisation of the operator with streamlined treatment of compliant terminals—would promote meaningful interim competition while avoiding the concern that trading of an incumbent's temporary rights could confer an artificial first-mover advantage before the long-term framework is established.
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 The principal consideration is that the interim framework remain genuinely transitional and not influence the competitive outcome of Ofcom's longer-term process. As discussed in responses to Questions 1 through 7, the interim authorisations should be limited to the period necessary

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	to preserve continuity of existing services, should align as closely as practicable with the EU's transitional timetable, and should not create transferable or tradeable rights that could enable an incumbent or another operator to establish a durable competitive advantage before the long-term framework for licensing 2 GHz MSS Bands is determined. At the same time, Ofcom should permit additional users to obtain separate, time-limited access directly from Ofcom where technically feasible and without undue interference, with such interim access providing no preference, renewal presumption, or other advantage in the subsequent longer-term selection process. These safeguards would preserve existing services and encourage efficient spectrum use and innovation during the transition while ensuring that Ofcom retains a meaningful opportunity to establish an objective, transparent, and competitive long-term framework for the 2 GHz MSS Bands.
Proposals for deciding on our longer-term approach to 2GHz MSS	
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 Ofcom should favour partial alignment with the EU on spectrum block sizes, frequency boundaries, authorised services, and technical conditions, while retaining an independent UK selection process. A framework based on three 2x10 MHz assignments would accommodate multiple SNOs and provide sufficient bandwidth for advanced MSS applications such as D2D, while reducing cross-border interference and supporting regional economies of scale. The UK selection process should be merit-based and should not use an auction, which would raise barriers to entry, increase service costs, and divert investment from network deployment. Likewise, Ofcom should exercise significant caution before applying Administered Incentive Pricing ("AIP") based on terrestrial IMT opportunity costs, as the economics, deployment requirements, and use of MSS spectrum differ materially from terrestrial mobile services. Option A—a minimal-intervention, ITU filings-led approach: While Lynk and Omnispace believe ITU priority is

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	important, this approach would significantly limit competition and efficient access to the 2 GHz MSS Bands. Ofcom recognises that this approach would likely result in the operator with the highest-priority ITU filing using the full bandwidth, potentially leaving no opportunity for another D2D provider to operate in-band. ITU filing priority should continue to govern international coordination and protection, but it should not independently determine how many operators receive domestic spectrum rights. Moreover, this approach would forgo the technical and operational benefits available from alignment with the developing EU framework. Option B—retaining the existing two 2x15 MHz assignments and making them tradeable: This approach creates substantial competition and operational risks. Continuing incumbent assignments would prevent Ofcom from restructuring the band to reflect new technologies, new entrants, and current market demand, while trading could allow spectrum rights to become concentrated through private transactions rather than an open selection process. Ofcom also recognises that two 2x15 MHz assignments would not align with the European Commission’s proposed three 2x10 MHz structure, creating potential inefficiencies and additional cross-border coordination requirements. Accordingly, long-term access should not depend on acquiring an incumbent’s existing spectrum position. Option C—a UK-led process: This approach provides Ofcom greater control over the number of operators, spectrum segmentation, and selection criteria, but the method of selection is critical. A merit-based competitive process would appropriately evaluate deployment readiness, spectrum efficiency, service capabilities, competition, and benefits to UK consumers. However, an auction risks favouring operators with the greatest financial resources rather than those positioned to make the most efficient and effective use of the spectrum, while imposing costs that could otherwise support satellite deployment and service development. Also, a UK-led process should avoid a unique UK band plan that creates unnecessary divergence from the EU and increases cross-border coordination burdens.

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	Option D—EU alignment: This approach offers the strongest technical and operational foundation, provided alignment focuses on the framework rather than automatically selecting the same operators as the EU. Partial alignment can establish common spectrum blocks, frequencies, services, and technical conditions while allowing Ofcom to select operators through an independent, merit-based UK process. Ofcom specifically recognises that this form of alignment can be implemented without waiting for the EU to complete its operator selection and can preserve the ability to choose operators that provide greater benefits to UK consumers. Finally, regardless of the long-term approach selected, Ofcom should not undermine these competitive benefits through an auction or an AIP methodology that assumes terrestrial IMT represents the appropriate opportunity cost for MSS spectrum; long-term fees should instead be proportionate to the characteristics and economics of satellite use and structured to encourage investment, entry, and efficient deployment.
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 The optimal long-term approach is a hybrid of Options C and D: a UK-led comparative selection process within a framework that is substantially aligned with the EU on spectrum structure and technical conditions. Ofcom should align, to the extent practicable, on spectrum block sizes, frequency boundaries, authorised MSS services, and technical conditions, including a structure capable of supporting three operators with approximately 2x10 MHz each. This hybrid approach would reduce cross-border coordination burdens, support economies of scale and a common equipment ecosystem, and preserve meaningful opportunities for multiple SNOs and emerging services such as D2D. At the same time, Ofcom should independently select the operators authorised in the UK rather than automatically follow the EU's operator selections or allow existing spectrum holdings to determine the outcome. Consequently, partial alignment would capture the benefits of regional harmonisation while preserving Ofcom's ability to select operators that deliver the greatest benefits to UK consumers.

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	Ofcom should implement this hybrid approach through an objective, transparent, merit-based administrative process that promotes competition without favouring incumbency, existing spectrum ownership, or financial scale alone. The process should evaluate proposed systems on a forward-looking basis, including their technical credibility and spectrum efficiency, use of established standards such as 3GPP 5G NTN, proposed coverage and services, contribution to competition and innovation, and prospective benefits to UK citizens and consumers. Although relevant ITU rights necessarily remain important to an operator's ability to coordinate and use its spectrum assignment, selection in the domestic process should not be determined by existing authorisations, private spectrum transactions, or ITU filing priority that conveys the entire band to a single SNO. Furthermore, Ofcom should avoid auctions, which risk allowing financial resources rather than the merits of a proposed MSS system to determine access, and should avoid setting AIP by assuming terrestrial IMT represents the appropriate opportunity cost for satellite spectrum, particularly where Ofcom's long-term AIP analysis remains to be undertaken. This hybrid approach would preserve a meaningful opportunity for capable new entrants while preventing incumbent rights, spectrum trading, or acquisition of those rights from effectively determining the long-term competitive structure of the 2 GHz MSS Bands before Ofcom conducts its selection.
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 In determining the longer-term framework, Ofcom should ensure that its approach remains forward-looking and neutral—<i>i.e.</i>, does not allow current market position, incumbent spectrum holdings, private spectrum transactions, or existing operations to determine future access to the 2 GHz MSS Bands. The satellite market is evolving rapidly, with new entrants, consolidation, emerging D2D services, and changing regional frameworks. Ofcom itself recognises the importance of competition, innovation, future demand, and the interests of parties wishing to use the spectrum. Accordingly, the framework should preserve a meaningful opportunity for credible new entrants and innovative systems (including those deploying through phased constellation development) and evaluate

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	proposed systems based on their credibility, technical capabilities, efficient spectrum use, and prospective benefits to UK citizens and consumers.
Question 12: Do you have any comments on the Impact Assessments?	Confidential? – N Lynk and Omnispace have no additional comments on the Impact Assessments beyond those set out in the responses to Questions 1 through 8 above, particularly regarding the appropriate duration and competitive effects of the proposed interim authorisations and the means by which additional users should be permitted to access the 2 GHz MSS Bands during the transitional period.