

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 Myriota supports Option three, a temporary extension of existing use, in preference to clearing the band under Options one or two. Clearing would disrupt services in use and would leave spectrum fallow at a time when demand for it is demonstrable. Ofcom has, however, overlooked a fourth option. The three options are framed as a choice between continuity for the incumbents and clearance of the band. A hybrid is available and is in Myriota's submission preferable: a short-term extension for the incumbents in the frequencies they use, combined with the immediate authorisation, from 14 May 2027, of shared narrowband access in a defined portion of the band. That portion need not be taken from the incumbents' operating frequencies. This is not a theoretical construct. The Australian Communications and Media Authority operates precisely such an arrangement in the same band, and Ofcom refers to it at footnote 51 of the consultation. Under the Australian replanning decision of January 2021, a paired 5 MHz at 2005 to 2100 MHz and 2195 to 2200 MHz is set aside for shared narrowband mobile-satellite services including satellite Internet of Things. Six operators now hold licences in that segment. Adopting the hybrid model would allow Ofcom to secure continuity of the incumbent services while avoiding the outcome that new narrowband entrants are excluded from the band for a further three to five years, and it would do so without prejudicing the long-term decision.

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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 Myriota agrees, subject to three qualifications. First, the authorisation should extend to the frequencies the incumbents actually use, and should not operate as a grant of the whole 2x30 MHz. Ofcom proposes at paragraph 5.13(a)(i) to clarify the frequencies on which equipment may connect to each network. Myriota supports that clarification and asks that Ofcom identify, in doing so, any portion of the band that is not in use by either incumbent. Second, Ofcom should satisfy itself as to who benefits. The consultation records at paragraph 2.22 that the Federal Communications Commission approved SpaceX's acquisition of EchoStar's 2 GHz spectrum access rights globally on 12 May 2026. The justification for the extension is continuity of existing services and the avoidance of consumer disruption. That justification is strong for the European Aviation Network. It is materially weaker for an authorisation whose practical beneficiary may be an operator that is not presently providing service in these frequencies in the United Kingdom. Third, the statement that the extension is without prejudice to future decisions should be given practical effect, and Myriota addresses this at Question 8.
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 Yes. Myriota supports a three-year fixed period and opposes five years. Ofcom's stated reason for preferring three years, that it allows a nearer-term decision on the long-term approach, is correct. Two further considerations support it. The uncertainty Ofcom identifies is expected to resolve well within three years. The European Council and European Parliament are considering the Commission's proposal of 27 May 2026, and the World

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	Radiocommunication Conference takes place in 2027. A five-year period would extend to 2032, several years beyond the point at which the matters said to justify deferral will have been settled. A five-year period also has a direct cost. Ofcom acknowledges at paragraph A3.13 that the proposal denies prospective users the ability to use the spectrum with long-term certainty. Narrowband satellite Internet of Things services do not require the further development that Ofcom anticipates for direct to device. They are standardised under 3rd Generation Partnership Project Release 17 and the equipment ecosystem exists. For those services the extension is not a period of maturation but a period of exclusion. Myriota supports the proposed further two-year extension only where Ofcom has published its reasons and has had regard to the position of prospective entrants.
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 Myriota supports the mechanism but not the restriction. Authorising user terminals by exemption rather than by individual licence is the correct approach and Myriota supports its retention. Satellite Internet of Things deployment involves very large numbers of low power terminals that are individually of negligible spectral significance. Individual terminal licensing is not workable for such networks. The Australian framework takes the same approach: the space station is licensed individually and the associated earth stations are authorised under the Radiocommunications (Communication with Space Object) Class Licence 2025, without individual terminal licences. The difficulty is the scope of the instrument. The Wireless Telegraphy (Mobile Satellite System Equipment) (Exemption) Regulations 2016 exempt terminals only where they connect to a network operated by Viasat or EchoStar. As Ofcom notes at paragraph A2.14, the Regulations do not presently specify frequencies. Ofcom proposes to amend them to add frequencies. Myriota asks that, in the same amendment, Ofcom also name additional operators and the frequencies in which their

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	terminals may transmit. Ofcom expressly contemplates this at paragraph 5.30, option two. Making that amendment at the same time avoids a second statutory notice process under section 122(4) of the Wireless Telegraphy Act 2006 and avoids a further delay of the kind foreshadowed at paragraph 5.31. Myriota has no comment on the Aircraft Radio licence.
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 Myriota does not prefer this approach and opposes it in the form described. Under this alternative Ofcom would revoke the 2016 Exemption Regulations and grant exclusive, tradeable licences to EchoStar and Viasat authorising both user terminals and complementary ground component base stations. Myriota makes four points. The exemption route for user terminals would be removed entirely. Any other operator's access to the band would then depend not on a regulatory pathway but on a commercial agreement with an exclusive licensee. Ofcom would have replaced an authorisation framework with a private bargaining position. The statutory threshold is demanding, and paragraph 5.17 does not address it. Section 8B(2) of the Wireless Telegraphy Act 2006 permits an exclusive licence only where necessary to protect safety of life services, or where exceptional circumstances justify it to secure a general interest objective. The second limb requires both. Paragraph 5.17 identifies a general interest objective, being the avoidance of inefficient use of frequencies, and treats it as though it were also the exceptional circumstance. Myriota respectfully does not see what circumstance is said to be exceptional. Administrative convenience during a transitional period is not, in Myriota's submission, an exceptional circumstance, particularly where the package proposed at paragraph 5.13 achieves the same continuity without exclusivity. If Ofcom maintains this approach it should identify the circumstances relied upon and expose them to consultation under section 8C. Nor, respectfully, does the objective hold. Exclusivity is said to avoid inefficient use, but the evidence on current

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	use does not support that. The Radio Spectrum Policy Group, examining this band, recorded that 14 Member States had no information on their national mobile satellite services market, that the single Member State identifying EchoStar's Internet of Things service had no information on its current use, and that EchoStar gave no answer on revenues. It recorded that it had no visibility on the bandwidth required for complementary ground component operation. On that record it recommended segmentation of the paired 30 MHz and concluded that the continuity scenario is not preferred because it may limit competition and future innovation. Ofcom's own record is consistent: footnote 12 records minimal use of the spectrum before 2014, paragraph 2.26 records opportunistic secondary use by programme making and special events services, and paragraph A2.14 records that neither operator is presently restricted in frequency although paragraph 5.13(a)(i) proposes to specify the frequencies each actually uses. Myriota respectfully submits that exclusivity over the whole of the paired 30 MHz would entrench that position rather than remedy it. Making the licences tradeable during an interim period compounds the difficulty. It confers a transferable asset on the incumbents in respect of spectrum whose long-term allocation Ofcom has expressly not yet decided, and does so, in EchoStar's case, in respect of rights whose acquisition Ofcom records at paragraph 2.22. If Ofcom nonetheless proceeds, Myriota asks that any exclusive licence exclude the narrowband portion of the band identified in answer to Question 7.
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 Myriota does not express a preference between retaining and waiving the complementary ground component licence fee, which it does not pay. It makes two points. First, whatever Ofcom decides for the incumbents, any fee applied to additional users admitted during the interim period under paragraph 5.30 should be cost-based, should be assessed at network level, and should be independent of the number of terminals connected. A

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	per-terminal fee is incompatible with satellite Internet of Things economics, where a single operator may serve very large numbers of low value devices, and regulatory cost is passed through to end users. Ofcom's own charges for satellite filing work, which range from GBP 1,000 to GBP 2,950 on a cost recovery basis, illustrate that effective oversight does not require substantial fees. Second, and more importantly, Myriota asks Ofcom to note now a difficulty that arises in Section 6. Ofcom indicates at paragraph 6.32 that administered incentive pricing may be appropriate for the long-term decision, and records at paragraph 6.33 that it has historically treated terrestrial mobile as the opportunity cost for this band. A fee benchmarked to terrestrial mobile opportunity cost would be prohibitive for narrowband services occupying 1 MHz or less, irrespective of how the band is segmented. If Ofcom segments the band to accommodate narrowband use, the fee methodology must be segmented with it, and the opportunity cost of a shared narrowband channel must be assessed by reference to the uses that can actually occupy it.
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 Myriota strongly agrees, and has a preference: Ofcom should adopt both of the options at paragraph 5.30, applying option two to user terminals and option one to space stations. Option two, amending the exemption regulations to name additional companies and the relevant frequencies, is the faster route and requires no new licence product. It should be done as part of the amendment already proposed at paragraph 5.13(a). Option one, direct licensing for a specified period, is appropriate for space stations, which are few in number and individually assessable. On the frequencies, Myriota asks Ofcom to make available for shared narrowband access the paired 5 MHz at the upper edge of the band, being 2005 to 2010 MHz and 2195 to 2200 MHz. This is the segment adopted by the Australian Communications and Media Authority, and the segment Ofcom identifies at footnote 51.

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	Ofcom asks whether additional access can be enabled without undue interference to the existing licensees. The Australian experience answers that question with operational evidence rather than assertion. Six operators hold apparatus licences in that segment. Their assignments are not exclusive and overlap in frequency. The licence conditions provide that coexistence between satellite systems licensed in Australia in these bands is a matter for licensees to self-manage, and that the regulator affords no protection from interference between them. The Australian conditions also demonstrate how incumbent services are protected. Earth station equivalent isotropic radiated power must not exceed minus 7 dBW and emission bandwidth must be at least 3.75 kHz. Where earth stations exceed a power density of 0.5 dBW/MHz, duty cycle must not exceed 1 per cent averaged over 15 minutes near high gain television outside broadcast receivers, and 10 per cent elsewhere. Geographic exclusions apply near sensitive receivers. Conditions of this kind are available to Ofcom as a template. Myriota is licensed in this segment in Australia. The Australian Communications and Media Authority authorised Myriota on 25 September 2025 under four apparatus licences covering a paired 1 MHz, being 2005.000 to 2005.500 MHz and 2007.750 to 2008.250 MHz in the Earth-to-space direction and 2195.000 to 2195.500 MHz and 2197.750 to 2198.250 MHz in the space-to-Earth direction.
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 Myriota makes three points on the detail. The statement that the extension is without prejudice should be given effect in the instruments themselves. Myriota asks that any licence granted for the interim period state on its face that it confers no expectation of renewal or of continued access beyond its expiry, and that Ofcom record that it will not treat continuity of interim use as a factor favouring the incumbents in the long-term decision.

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	Ofcom should confirm the position on transfer. The European Commission's proposal provides that rights of use granted to incumbents during its two-year extension may not be transferred, leased or sub-leased. Ofcom does not propose an equivalent restriction. Given the acquisition of EchoStar's rights recorded at paragraph 2.22, Myriota asks Ofcom to state whether the interim authorisation may be transferred, and if so on what terms. Where Ofcom specifies the frequencies on which each operator's terminals may transmit, Myriota asks that the resulting frequency information be published, so that prospective users of the arrangements at paragraph 5.30 can identify which frequencies are available and can frame requests accordingly.
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 Myriota comments on each approach, and then on one premise common to Ofcom's assessment. Option A, minimal intervention led by International Telecommunication Union filings, would in practice confer the band on the holder of the most senior filing. This is not the optimal use of the spectrum. Annex 3 sets out the consequence: an operator with a junior filing must coordinate with every senior filing and may have to accept reductions in bandwidth or coverage, if anything at all. The filings supporting the current authorisations date from the period of the 2009 European award. Option A would therefore foreclose new entry by operators whose filings are necessarily later, however efficient their intended use. Myriota's position, which it has put to other administrations, is that a system that is not in efficient use, or that is incapable of sharing, should not be permitted to foreclose an entire band by reason of filing priority alone. Nor should Option A be regarded as the simple approach that avoids difficulty. It does not align with the European

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	Union's approach, and misalignment carries its own complications. Satellite footprints over the United Kingdom and mainland Europe will inevitably overlap, and an isolated United Kingdom arrangement would produce either operational complexity or inefficient use of the spectrum, or both. Option B, retaining the status quo with tradeable licences, contains no cap on individual holdings and no mechanism requiring efficient use. It relies on trading to correct misallocation. Ofcom will be aware that a licensee has no incentive to trade to a competitor at a price below its own strategic value in excluding that competitor. The optimal use of spectrum is not necessarily the use of the party willing to pay the most for it. Relying on Option B for the whole band would exclude services capable of delivering substantial benefit in the United Kingdom. Option C, a United Kingdom led process, is workable provided the band is segmented before any award and provided a shared narrowband segment is reserved outside the competitive process. Myriota opposes assignment of narrowband spectrum by auction, which systematically favours the most heavily capitalised applicants and forecloses specialised operators whose spectrum requirement is measured in hundreds of kilohertz. Option D, alignment with the European Union, is supported in part. The Commission's proposal of 27 May 2026 divides the spectrum into paired 5 MHz blocks, prioritises new entrants for a defined portion, applies a cap of a paired 10 MHz on any single commercial operator, and provides for an annual fee designed to discourage hoarding. Those four features are worth adopting irrespective of whether the United Kingdom aligns on the identity of licensees. On the common premise: Ofcom states at paragraph 3.43 that there are bands other than 2 GHz mobile-satellite service available for Internet of

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	Things use, naming 136 to 137 MHz, 399.9 to 403 MHz and the short range device bands at 862 to 870 MHz. Myriota respectfully submits that this understates the difference between those bands and the 2 GHz band. The 2 GHz band is standardised under 3rd Generation Partnership Project Release 17 for narrowband Internet of Things over non-terrestrial networks, as Ofcom records at paragraph 3.10. The bands named are not. The 862 to 870 MHz range is a terrestrial short range device band, not a satellite allocation. The consequence is that services in the named bands cannot use standardised chipsets, modules or devices, and cannot benefit from the equipment ecosystem and economies of scale that Ofcom identifies at paragraph 3.35(b) as a principal benefit of harmonisation. They are not substitutes for the purpose of assessing competitive constraint. Availability is a further difficulty, and the restrictions applying to ultra high frequency operations in the United Kingdom make satellite Internet of Things in those bands prohibitive in practice. In the 399.9 to 403 MHz range there is at present no clear authorisation framework for the Earth-to-space direction, and the space-to-Earth portion at 400.15 to 401 MHz is subject to footnote UK2.1 of the United Kingdom Frequency Allocation Table, under which responsibility for granting permission to use frequencies in that allocation rests with Defence and all frequency permissions are reserved exclusively for Defence use except where assignments for civil use are agreed with Ofcom. Spectrum for which no uplink can presently be authorised, and whose downlink is reserved to Defence subject to case by case agreement, is not spectrum around which a commercial operator can plan a constellation. Myriota asks Ofcom to identify, if it maintains the assessment at paragraph 3.43, the authorisation route by which a satellite Internet of Things operator could actually obtain access to each of the named bands. Absent such a route, the assessment at paragraph 3.43 cannot bear the weight placed on it, and the importance of ensuring suitable access to S-band mobile-satellite service

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	spectrum for satellite Internet of Things is correspondingly greater.
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 Myriota considers the optimal approach to be a combination of Options C and D: a United Kingdom led process, aligned with the European Union on block sizes, service types and spectrum caps, rather than on the identity of licensees. Ofcom has not considered one alternative, which Myriota outlines. Each of the four approaches is presented as an approach to the whole band. A fifth is to segment the band first and then apply different approaches to different segments. On that approach, a paired 5 MHz at 2005 to 2010 MHz and 2195 to 2200 MHz would be designated for shared narrowband mobile-satellite services, authorised on a licence exempt or lightly licensed basis, open to any operator meeting defined technical conditions, with a cap of 1 MHz per operator. The remaining paired 25 MHz would be awarded through whichever of Options B, C or D Ofcom concludes is optimal for wideband services. This has four advantages over any whole-band approach. It resolves the trade-off Ofcom identifies at paragraph 6.5 rather than accepting it, because narrowband and wideband services are not competing for the same spectrum. It answers the guard band efficiency concern recorded at footnote 33, since narrowband services can occupy the guard bands between wideband blocks, which is the possibility Ofcom itself raises at paragraph 6.8. It aligns with the European Union, whose proposal contemplates low data rate services taking a portion of a shared paired 5 MHz block rather than a full block. It is the approach already adopted by the Australian Communications and Media Authority and, Myriota understands, under consideration in the Kingdom of Saudi Arabia, as Ofcom notes at paragraph 3.24 and footnote 51. Ofcom has mentioned the opportunity cost of the 2 GHz band, and discussed various fee mechanisms. Myriota

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	would like to respectfully remind Ofcom that market forces (such as fees and trading) can help improve the efficiency of spectrum utilisation, however they don't necessarily provide the optimum use of spectrum. To maximise the greatest benefit to the UK, Ofcom should consider a band segment with lower fees, that is able to be divided or shared between operators of satellite IoT.
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 Myriota provides additional comments on the following four factors. Bandwidth requirements for narrowband services: The 3rd Generation Partnership Project specification for narrowband Internet of Things uses a 200 kHz channel. For an S-band carrier served by satellites in low earth orbit, a guard band of approximately 50 kHz at each edge accommodates Doppler shift. A single channel therefore occupies approximately 300 kHz, and a minimum viable allocation of two channels occupies 500 kHz in each direction. Up to 1 MHz bandwidth in each direction provides additional capability for a narrowband IoT service, which is consistent with the paired 1 MHz that the ACMA successfully licences to systems in Australia, such as Myriota. Sharing profile: Narrowband Internet of Things terminals transmit short bursts of up to 262 milliseconds at duty cycles of the order of 0.02 per cent per day. Aggregate occupancy is accordingly very low, which is why co-frequency sharing between several such operators is achievable, as is in operation in Australia. Licence duration: Myriota's position, given in response to the Call for Input and maintained, is that a term of at least 10 years is required to justify the capital commitment involved in deploying a constellation, and that terms of 20 years or more are excessive unless coupled with milestone reviews. Myriota supports milestone based review points and conditions requiring spectrum assigned but not deployed within a defined period to be subject to review. Device ecosystem: Ofcom observes at paragraph 3.35(a) that user equipment for direct to device is not yet available. That observation does not extend to

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	Internet of Things. Standardised narrowband Internet of Things modules for non-terrestrial networks exist and are deployed. In assessing which uses can deliver benefits soonest, Ofcom should distinguish between the two.
Question 12: Do you have any comments on the Impact Assessments?	Confidential? – N Myriota has one comment, directed to the treatment of prospective users. Ofcom recognises at paragraph A3.13 that the proposal prevents prospective alternative users from accessing the spectrum with long-term certainty, and that to the extent any are ready to offer services now the proposal could have a negative impact on them and deny citizens and consumers access to those services. Myriota is such a user. Ofcom then discounts that impact at paragraph A3.14 on two grounds: that there is uncertainty over the timelines of future service availability, and that alternative frequencies are available as discussed at paragraph 3.43. Neither ground supports the conclusion in respect of narrowband Internet of Things. On the first, there is no relevant uncertainty as to timing where the technology is standardised, the equipment exists and the service is licensed and operating in the same band in another jurisdiction. On the second, for the reasons given in answer to Question 9, the bands named at paragraph 3.43 are not substitutes. The mitigation on which Ofcom relies at paragraph A3.16 is that measures to enable others to access the spectrum will be consulted on in future. The harm, however, begins on 14 May 2027. Paragraph 5.31 indicates that a further consultation on the authorisation mechanism will follow a decision on the primary approach, which defers the mitigation beyond the point at which the harm arises. Ofcom is required to ensure that regulatory action is taken only where needed and that any action is proportionate. A less intrusive course is available and would cost nothing in terms of the objectives Ofcom has identified: amending the 2016 Exemption Regulations to name additional operators and frequencies at the same

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	time as the amendment already proposed at paragraph 5.13(a), rather than in a later process. Myriota asks Ofcom to reconsider the impact assessment on that basis.