Your response

Question	Your response
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** Clearing the band and moving directly to a long-term authorisation framework may not be the most appropriate course of action at this stage. Satellite services derive significant benefits from internationally harmonised regulatory and spectrum management frameworks. As the European Union has not yet reached a long-term decision regarding the future use of the band, adopting a definitive national approach now could prove premature, potentially creating misalignment with future European developments and reducing regulatory certainty over the longer term. At the same time, leaving valuable MSS spectrum unused is equally undesirable. The spectrum should be utilised efficiently and in a manner that supports innovation, competition, and the delivery of new services to consumers and businesses. Any transitional arrangement should therefore be explicitly designed to facilitate market entry by new MSS and NTN operators, rather than reinforcing or entrenching existing incumbent positions. The preferred approach should promote a level playing field and ensure that emerging operators have a realistic opportunity to access spectrum and demonstrate innovative services. A carefully structured interim solution would also provide Ofcom with sufficient time to monitor developments at the European level and align any eventual long-term framework with broader regional policy decisions. This would help maximise regulatory consistency, reduce the risk of future market disruption, and support a more future-proof outcome. It is also important that spectrum access be made available to new entrants on a time-limited basis pending a final long-term decision. Such an approach would enable effective and efficient use of the spectrum in the short term while preserving flexibility for future policy and licensing decisions once the wider European direction becomes clearer.

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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** Option 3 appears to be the most appropriate approach. However, careful consideration should be given to the design and implementation of the transition period, as its success will largely depend on how effectively it balances the interests of existing users with the objective of enabling future market access. By definition, a transition period is intended to facilitate the migration of customers and services from one technical or spectrum solution to another. In this context, the purpose of any transitional arrangement is to provide incumbent operators with sufficient time to move users from the current frequency band to alternative platforms, technologies, or spectrum resources. It is therefore unrealistic to assume that the level of frequency assignment usage observed today will remain constant throughout the transition period. On the contrary, as customers are progressively migrated to alternative solutions, demand for the existing assignments should decline over time, resulting in a corresponding reduction in the amount of spectrum that is genuinely required. For this reason, the conditions attached to any transitional authorisation should be proportionate to actual operational requirements rather than based solely on historical holdings. Both the duration of the transitional period and the amount of spectrum made available should reflect demonstrated and ongoing need. If evidence shows that incumbent operators need only a portion of the spectrum they currently hold, then any temporary extension should be limited to the spectrum necessary to support the migration process, rather than automatically preserving unused or underutilised frequency assignments. Such an approach would help ensure that valuable spectrum resources are used efficiently while avoiding the unnecessary warehousing of spectrum during the transition phase. It would also create opportunities to make unused capacity available to other operators that are ready to deploy services.

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	Importantly, the transition framework should be designed so that access to spectrum by new entrants increases progressively over time. As incumbents migrate customers and relinquish spectrum that is no longer required, that spectrum should be released and made available to new MSS and NTN operators through an appropriate access mechanism. This would ensure that the transition period serves not only as a means of protecting continuity of service for existing users, but also as an effective mechanism for promoting competition, innovation, and the introduction of future new services.
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? – **Y**

Question	Your response
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? – **Y**

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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** OQ Technology sees merit in a satellite operator licensing framework, particularly where it: • provides regulatory certainty for MSS operators and users; • enables spectrum sharing and coexistence where appropriate; • supports multiple MSS operators on a fair and non-discriminatory basis; and • facilitates deployment of standardised 3GPP NTN services and future satellite-direct-to-device ecosystems. OQ Technology considers that such an approach could provide a more coherent and accountable regulatory framework than licence exemption, particularly during the proposed transitional period. With respect to tradability, OQ Technology sees limited value in permitting spectrum trading within a temporary authorisation regime. The purpose of the transitional period is to ensure continuity of existing services and provide incumbent operators with a managed pathway towards the long-term regulatory framework. Allowing rights to be traded during this period risks creating additional complexity and uncertainty without delivering clear public-interest benefits. Where spectrum rights are no longer required by a licensee during the transitional period, Ofcom should retain the ability to review and reassign those rights in a manner that best promotes effective and efficient spectrum use, competition and future market access. The temporary regime should therefore focus on continuity of service and effective and efficient spectrum management rather than the creation of transferable spectrum assets.
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? – **Y**

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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** OQ Technology supports Ofcom's proposal to facilitate access to the spectrum during the interim period, subject to appropriate safeguards to protect existing authorised services from harmful interference. Enabling additional use of the band during the transitional period is consistent with Ofcom's objectives of promoting efficient spectrum use, supporting innovation, encouraging competition and delivering benefits to UK consumers. Given the uncertainty surrounding the band's longer-term future use, it is appropriate that spectrum which may otherwise remain unused or underutilised can be made available for compatible services on a temporary basis. We recognise that the existing Innovation and Trial licensing framework provides an important route for research and development activities. However, there is a growing need for mechanisms that support pre-commercial and commercial trial deployments, including large-scale beta services, customer demonstrations and market validation activities, where greater certainty is required than can be provided under a non-interference, non-protection regime. We therefore support the introduction of a specific mechanism to enable temporary commercial access during the extension period.

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	We prefer Option 1, under which Ofcom would directly authorise additional users through a time-limited licensing framework. In our view, this approach offers several advantages: • It provides greater regulatory transparency and certainty for applicants. • It establishes a direct licensing relationship between Ofcom and the temporary user, with clearly defined rights and obligations. • It allows access conditions to be tailored to the specific frequencies, geographic areas, technical parameters and duration required. • It provides a more scalable and non-discriminatory mechanism should multiple parties seek access during the transition period. By contrast, Option 2, which would rely on naming additional entities within the licence exemption framework, appears less flexible and could become administratively complex if demand increases or access requirements evolve over time.
Question 8: Do you have any other views on the details of our proposal to authorise Viasat and EchoStar during the interim period?	Confidential? – **Y**

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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** We consider that the technical and operational implications of the different authorisation approaches should be given significant weight in Ofcom's assessment, particularly given the international nature of MSS and emerging D2D services. Across all options, a key consideration is that successful deployment of D2D services will depend not only on domestic authorisation arrangements but also on access to satellite infrastructure, handset ecosystems, international spectrum coordination, and the ability to operate across multiple jurisdictions. As a result, technical and operational efficiency is likely to be maximised where regulatory frameworks support harmonised deployment at a regional scale. **Option A (ITU filings-led approach)** would provide simplicity from a coordination perspective where a single operator with a high-priority filing is able to make use of the spectrum. However, this approach could limit operational flexibility and may reduce opportunities for innovation and competition if access is effectively concentrated in the hands of a single provider. It may also limit the development of a broader D2D ecosystem if other potential users are unable to obtain access to the band. **Option B (retaining incumbent authorisations with trading)** could enable spectrum to move to higher-value uses over time through commercial transactions. However, from an operational perspective, the effectiveness of this approach would depend on the willingness of licence holders to participate in trading arrangements and the ability of market participants to negotiate access in a timely manner. The approach may also result in uncertainty regarding future spectrum availability and service deployment plans. **Option C (a UK-led award process)** would provide Ofcom with the greatest flexibility to tailor outcomes to UK policy objectives. However, there may be technical and operational challenges if the resulting authorisations are

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	not aligned with wider European arrangements. Divergent band plans, operator identities or licensing structures could increase coordination complexity, reduce economies of scale, complicate device support and increase implementation costs for service providers. **Option D (alignment with the European Union)** appears likely to offer the greatest technical and operational benefits. Harmonisation of spectrum arrangements, service assumptions and technical conditions across a larger geographic market would support equipment standardisation, improve economies of scale, facilitate cross-border operation and reduce coordination complexity. These factors are particularly important for D2D services, where satellite operators, mobile network operators, chipset manufacturers and handset vendors all benefit from consistent regulatory frameworks across multiple markets. We also note that the majority of respondents to Ofcom's Call for Input highlighted the importance of alignment in supporting interoperability, reducing interference risks and creating a sustainable commercial ecosystem. In our view, these considerations are likely to become increasingly important as D2D services mature and move towards mass-market adoption. On balance, we believe the technical and operational considerations favour a degree of alignment with the emerging European framework. Whilst Ofcom should retain flexibility to address UK-specific requirements where necessary, avoiding unnecessary divergence is likely to deliver the greatest long-term benefits in terms of spectrum efficiency, service availability, investment certainty and consumer outcomes.
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** On balance, we believe **Option D is most likely to deliver the greatest long-term benefits to UK citizens and consumers**. A framework that is aligned with Europe offers the best opportunity to support investment, encourage innovation, enable pan-European D2D services, achieve economies of scale and promote efficient spectrum use. We therefore encourage Ofcom to continue engaging closely with European institutions and stakeholders,

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	while retaining sufficient flexibility to ensure that any final framework delivers the best outcomes for the UK market. Options A, B and C each offer certain advantages. However, all three carry a greater risk of divergence from the emerging European framework, potentially resulting in: • reduced economies of scale; • increased coordination complexity; • greater regulatory uncertainty; • higher deployment costs; and • a less attractive environment for long-term investment. Given the strong support for harmonisation expressed by stakeholders during the Call for Input process, we consider that the benefits of alignment are likely to outweigh the potential advantages of a standalone UK approach.
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** We would also encourage Ofcom to consider fee structures that support efficient use without creating barriers to market entry or discouraging investment in innovative services. An excessively high fee level could reduce the attractiveness of the UK market and undermine the policy objectives that Ofcom is seeking to achieve through the long-term authorisation framework. Overall, we support Ofcom's proposal to review the fee framework as part of its long-term authorisation decision. However, we believe any future pricing approach should reflect both spectrum efficiency objectives and the need to encourage investment, innovation and sustainable deployment of MSS and D2D services in the UK.
Question 12: Do you have any comments on the Impact Assessments?	Confidential? – **N** We broadly agree with Ofcom's conclusion that a short-term extension of the existing authorisations is preferable to clearing the band while uncertainty remains regarding future market developments, service readiness and the emerging European framework. The proposed approach supports continuity of existing services, avoids

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	the spectrum lying fallow, and provides Ofcom with additional time to assess longer-term options. However, we believe the Impact Assessment could place greater emphasis on the benefits arising from allowing additional users to access the band during the transition period. As recognised in the consultation, there is significant interest in the spectrum from prospective D2D, NTN and IoT providers, and the proposed interim access mechanisms could enable commercial trials, beta services and early market entry by new participants. In our view, the transition period should not be seen solely as a means of maintaining incumbent services. It should also provide a pathway for new entrants to establish a presence in the UK market, demonstrate services, develop partnerships and generate evidence on future demand and coexistence. These benefits are not fully reflected in the current assessment. We also encourage Ofcom to give greater weight to the benefits of future alignment with the European framework. The consultation identifies potential advantages including economies of scale, interoperability, reduced coordination complexity and lower interference risk. The transitional period provides an opportunity to better understand these benefits before a long-term decision is taken. Finally, we are not convinced that spectrum trading alone should be relied upon as the primary mechanism for addressing underutilisation of the band. Spectrum is a scarce public resource and should be used efficiently in the interests of consumers and competition. Where an authorised user is unable or unwilling to make effective use of spectrum, Ofcom should retain the ability to reclaim and reassign that spectrum through a transparent regulatory process. Underutilised spectrum should not automatically become a tradable asset if doing so delays market entry or restricts opportunities for innovative new services.

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