

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?	Satellite Connect Europe (SCE) considers that the long-term framework for the 2 GHz MSS band should maximise consumer benefit, innovation, investment and efficient use of spectrum. In this regard, direct-to-device (D2D) mobile broadband services delivered in partnership with mobile network operators can deliver substantial long-term benefits to UK consumers, businesses and public services. There are significant technical and economic benefits in harmonising the use of the MSS 2 GHz band with neighbouring countries. This point was underlined by responses to Ofcom's call for input. Harmonisation can reduce cross-border coordination complexity, support efficient spectrum use, improve investment certainty and create economies of scale for the deployment of future D2D services. It also preserves the opportunity for the UK to align its long-term framework with developments in neighbouring jurisdictions where this is in the interests of UK consumers and businesses. SCE encourages Ofcom to work closely with neighbouring administrations, including the European Union, and, where feasible, align long-term authorisation processes and technical frameworks. We agree with Ofcom's assessment of the three options. Options 1 and 2 would result in the band being cleared and left largely unused in the short-to-medium term. We therefore support Option 3: an extension giving Ofcom more room to consider the band's long-term use. SCE notes that the draft regulation proposed by the European Commission broadly corresponds to Option 3, albeit with some notable differences: • It proposes a short-term extension limited to two years; • It limits the extension to existing services, helping preserve a level playing field between future candidates; and • It opens the band to testing by all stakeholders during the interim period.

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	SCE considers that these safeguards are appropriate not merely because they form part of the proposed European approach, but because they would protect competition and preserve Ofcom's flexibility to adopt the long-term framework that delivers the greatest benefits to the UK.
Question 2: Do you agree with our proposal for a short-term transition period, which authorises Viasat and EchoStar? Please set out your reasoning.	SCE recognises Ofcom's objective of ensuring continuity for existing authorised users and avoiding unnecessary disruption during the transition period. Any interim arrangements should avoid conferring material competitive advantages that could influence the outcome of a future long-term authorisation process. In particular, SCE considers that interim rights should remain limited to existing services and should not permit the launch of new commercial services or the transfer of rights to third parties. Such an approach would strike an appropriate balance between continuity for existing users and maintaining a fair, open and competitive process for determining the future use of the band.
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.	SCE considers that the interim period should be selected to enable the UK to join the EU procedure. A transition period aligned with the approach under consideration within the European Union would provide sufficient continuity for existing services whilst preserving Ofcom's flexibility to determine the optimal long-term use of the band. An interim period enabling the UK to join the EU procedure would reduce the risk of delaying investment and innovation associated with future D2D services and other potential uses. Should additional time ultimately prove necessary, Ofcom would retain the flexibility to consider a further extension. By contrast, adopting a longer period at the

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	outset could unnecessarily delay the implementation of a long-term framework and the benefits it would deliver. SCE therefore supports a transition period allowing the UK to align with the EU procedure, including in term of allocation of the new licences, and supports enabling testing and innovation activities by interested stakeholders during that 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.	N/A
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.	SCE does not support the alternative approach of licensing satellite operators directly during the interim authorisation period. Establishing a new licensing framework for a temporary transition period would be disproportionate and inconsistent with the limited purpose of such an arrangement. The objective of the interim period should be to provide continuity for existing services whilst Ofcom develops a long-term framework for the future use of the band, rather than to establish a new authorisation model. Creating a separate licensing regime would introduce additional regulatory complexity and uncertainty for both existing and prospective users of the band. It could also create a perception that interim rights carry greater significance than their intended transitional purpose.
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.	SCE considers that the interim authorisation framework should continue to promote efficient use of spectrum and support timely transition towards the long-term use of the band. As new satellite and direct-to-device (D2D) services become commercially deployable, the opportunity cost associated with retaining spectrum in transitional arrangements increases. Spectrum fees can therefore play an important role in maintaining incentives for efficient

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	spectrum use and timely migration from interim authorisation arrangements. SCE does not support waiving the fee associated with the CGC authorisation. Removing fees could reduce incentives for existing users to complete migration activities in a timely manner and could contribute to prolonging transitional spectrum arrangements beyond what is necessary. Maintaining an appropriate fee framework during the interim period would be more consistent with the objectives of efficient spectrum management and facilitating a timely transition to a long-term authorisation framework.
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.	SCE supports innovation, trial licensing and testing opportunities for all interested stakeholders during the interim period. However, interim arrangements should not evolve into a prolonged commercial regime. Ofcom should carefully distinguish between research and testing activities and the operation of commercial services during the transition period. Whilst enabling broader access to the band may support innovation, extended commercial operation by a limited number of providers could create material first-mover advantages ahead of the establishment of the long-term authorisation framework.
Question 8: Do you have any other views on the details of our proposal to authorise Viasat and EchoStar during the interim period?	SCE's primary concern is that interim authorisations should be limited in scope and duration, and should not prejudice the outcome of the future long-term authorisation framework. SCE therefore supports: • Limiting interim rights to existing services; • Prohibiting the transfer or trading of interim rights; and • Enabling trial and innovation access for other stakeholders.
Proposals for deciding on our longer-term approach to 2GHz MSS	

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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?	NGSO direct-to-device (D2D) systems typically operate with significantly smaller beam footprints than geostationary satellite systems and other satellite architectures. For such systems, the principal technical benefits for coverage, capacity and spectrum reuse are derived from harmonised spectrum use across neighbouring countries. By contrast, the relevance of ITU filing priorities is likely to be concentrated primarily in border coordination scenarios. For this reason, SCE considers that alignment between the UK and neighbouring European administrations would deliver significant technical and operational benefits and support more efficient use of the band. There are clear advantages in pursuing synergies with the EU authorisation process. SCE also notes that certain existing or alternative uses of the band may increasingly be capable of relying on other spectrum resources. in-flight connectivity services are increasingly being delivered using Ka- and Ku-band satellite systems, whilst Ofcom itself notes that there are bands other than 2 GHz MSS available for IoT use. SCE considers that D2D represents the most significant long-term opportunity for the 2 GHz MSS band, given its potential to support mobile coverage extension, resilience, innovation and integration with terrestrial mobile networks. This reinforces the importance of adopting a long-term framework that enables efficient, large-scale and harmonised D2D deployment, rather than extending transitional arrangements in a manner that could distort future competition. In relation to the four approaches identified by Ofcom: • Option A would place significant weight on ITU filing priority. SCE is concerned that this approach could pre-select future access based on filing status rather than on the technical merits of proposed services, benefits to UK consumers, partnership with UK mobile network operators, efficient spectrum use or alignment with neighbouring jurisdictions. • Option B would risk reducing Ofcom's ability to shape the long-term use of the band in line with its statutory duties, including the promotion of

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	competition and optimal use of spectrum. SCE is concerned that this approach may not provide the best framework for securing innovation, investment and consumer benefit. • Option C could provide a UK-specific framework, but would raise technical and economic challenges if it were not aligned with the approach taken by neighbouring European administrations. • Option D offers the greatest potential benefits, particularly if the UK works closely with the EU and other neighbouring administrations in developing the long-term framework. This approach would support harmonisation, reduce coordination complexity, improve investment certainty and promote efficient long-term use of the band. SCE strongly supports alignment between the UK and European approaches to the future authorisation of the 2 GHz MSS band. Such alignment should focus on the overall authorisation framework, timing, technical criteria and conditions, and coordination arrangements. Alignment would enable compatible operation, cross-border coordination and economies of scale across Europe. Importantly, subject to a European Commission delegated act extending admissibility to the UK, it would enable UK operators to fully participate across all award categories in the EU.
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.	SCE considers that the optimal long-term approach is one that supports large-scale D2D deployment, promotes competition, maximises efficient use of spectrum and remains closely aligned with neighbouring European administrations. SCE strongly supports alignment with the future European framework for the 2 GHz MSS band (Option D) based on both: • Technical considerations: operating different MSS frameworks in closely connected neighbouring markets would increase coordination complexity and could reduce spectrum efficiency and service performance;

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	Economic considerations: innovative MSS and D2D services require substantial long-term investment. Such investment is more readily justified where regulatory frameworks are broadly harmonised across the UK, Norway, Switzerland and the European Union. Such alignment should encompass the overall authorisation approach, timing, selection criteria, technical conditions and cross-border coordination arrangements. SCE considers that broadband D2D services require access to sufficiently large spectrum assignments to support high-capacity services, innovation and long-term investment. Ofcom should therefore ensure that the future framework provides successful applicants with adequate spectrum resources to deliver high-quality services at scale.
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?	N/A
Question 12: Do you have any comments on the Impact Assessments?	N/A