

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 SES agrees that Option 3, as set out in the consultation document, is the best of the three options considered. While Option 1 to remove any current use and clear the bands, then consult on specific proposals for the longer term in 2027 would provide new entrants an opportunity to launch anticipated services more quickly, we recognize such a blunt cut approach could harm the existing users. It is more appropriate to provide a brief extension during which the incumbents can transition their customers smoothly to new spectrum or new technologies. Option 2, which proposes to clear the band and leave the spectrum fallow until the future EU framework and demand becomes more certain, should not be adopted for similar reasons. It could harm existing users unnecessarily. Option 3, which would allow a temporary extension of existing business usage until there is further clarity, seems most appropriate. However, we believe the extension should remain limited in time and scope. The extension should not extend beyond two years to align with the EU proposal and should only authorise the continuation of services existing as of the date the consultation was published. This will avoid the possibility that incumbents will use the extension period to expand services, thereby making it more difficult to transition them and encumbering the deployment of new services in the spectrum. As illustrated by several NTN-TN partnerships across the world, the D2D market is rapidly developing. The D2D market will notably need to rely on access to the 2 GHz MSS spectrum. In the UK, many actors, including SES, have expressed their interest in the Call for Inputs on the Future Use of 2GHz MSS held by Ofcom in July 2025 [SES]. It is essential to ensure new players can use this spectrum for the delivery of D2D services in the UK on a timeframe that aligns with the rest of Europe. Obstacles that delay deployment in the UK will harm UK citizens and consumers and delay roll-out of innovative technologies and satellite services using the MSS. The timing to reopen the 2GHz MSS spectrum to new competition and enable the introduction of new types of

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	services, including D2D, should be considered in view of the most recent EU developments and the EU's intention to accelerate the reassignment procedure. It is expected that the EU Council and European Parliament will have completed their considerations of the European Commission's recent proposal by mid-2027. Therefore, we encourage Ofcom to act quickly and avoid unnecessary delays in implementing its plans for future use of the 2 GHz MSS band.
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 SES supports a short-term transition period for incumbents, but with limited duration and scope. The short-term transition should be limited to enabling service transitions by the incumbent licensees. During this period, incumbents should not be permitted to expand use of the spectrum for new services or new users. Such expansion will only complicate the introduction of new services or new licensees. We do not support the possibility of opening this band to new entrants during the extension period even on a limited-time basis. Such an approach creates a back door to accessing the spectrum for a longer term without a full review compared to other potential services. Opening the 2 GHz MSS spectrum to new players during this transition period risks creating new situations difficult to terminate when time comes to fully re-define long-term plans and usage conditions for new, innovative 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? – N Ofcom proposes a transition period of 3-5 years to prevent disruption to current services and ensure the spectrum continues to be used. Considering the EU planned two-year license extension and WRC-27 decisions to take effect as of January 2029, three years should be the maximum authorized extension period; however, SES recommends a two-year period to align with the EU proposal.

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	It is important not to create a situation where incumbents and new players may invest, expand or develop businesses during the extension period without going through a fair and competitive reassignment procedure.
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 agree with the proposed approach for authorising the incumbents for a short-term extension of their operations.
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 We have concerns about the option for a stand-alone / exclusive license held by the satellite operators authorising user terminals and deployment of CGC base stations connecting the satellite network if these are tradeable. It is unclear which exceptional circumstances would justify it, as indicated in the consultation. As noted above, we believe Ofcom should avoid introducing mechanisms that would allow expanded use of the band or allow new entrants to use the band and potentially create a barrier to new entrants under a long-term strategy and licensing regime.
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 We support the implementation of Option 1, continuing the existing fee structure. It is aligned with the overall goal of continuing existing services until they can be transitioned out of the spectrum. Option 2, which would waive the fees for the CGC, on the other hand could create an incentive for incumbents to attempt to expand services because their overall costs would go down. Furthermore, the opportunity cost for continuing those services has not diminished and arguably increases during the extension period. There are operators who are ready, willing and able to put the spectrum to better, more efficient use that will generate more value for UK consumers and businesses. Delaying entry into the market comes at a cost of undermining the benefit to UK consumers, competition and innovation.

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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 Any opening to additional users during the transition period should be strictly limited to experiments and trials by interested parties, for a limited period of time and solely for non-commercial purposes. As discussed above, granting new entrants commercial access to the band even on a time or geographically limited basis is very likely to complicate the transition of current services out of the band and the implementation of a long-term plan for allocating the frequencies to new users. New users that obtain access during the extension period will also have an advantage over other operators who may seek to obtain a full-time license in the future.
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 We do not have any additional comments.
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 SES encourages Ofcom to align as much as possible with the final EU approach to the 2GHz MSS band, including the band split and licensees; however, we recognize that the UK has its own national interests to consider in the final decision. The key element of alignment should be the band plan, which would reduce potential interference at borders and ease the ability for UK licensees and EU licensees to partner where possible. SES strongly believes some alignment with the European Union approach will be beneficial to satellite players who are inherently pan-European and even global. This will be critical for economies of scale and technical coexistence (interoperability & reduced interference risks). SES does not believe Option A (ITU filings minimal approach) and Option B (licensing status quo and spectrum trading) will ensure effective and efficient use of spectrum. Option A will not enable alignment with EU and

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	risks resulting in a single operator offering a single service in the band. Option B will risk making the incumbent operators the final arbiters of who can operate in the band going forward. It is more appropriate for Ofcom to make such an important decision. A UK-led approach (Option C) that includes some alignment with EU, or thorough alignment with EU (Option D) will be more conducive of competition and innovation.
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 believe option D is the optimal solution because it will ensure UK consumers benefit from the scale that licensees can achieve across Europe. It will also give UK innovators a larger market of potential customers for products they develop, e.g. automakers.
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 The UK has been on the forefront of developing D2D markets. For example, Ofcom has implemented amendments to the Wireless Telegraphy (Direct to Device Satellite Communications) Regulations 2026 to introduce a licence exemption for mobile handsets and SIM-enabled devices connecting to D2D services, in order to enable Vodafone Three to provide such services using its licensed spectrum in 900 MHz. [Statement: Direct to Device licence exemption regulations update]. Based on the high interest expressed by multiple stakeholders in the Ofcom CFI held in 2025 [Call for Input: Future use of the 2 GHz MSS band], we recommend moving forward now to prepare plans for spectrum reassignment in the 2GHz MSS band. SES and many others have expressed clear intentions to deploy D2D services in the near future. [SES] Ofcom is already taking many steps to support these services, and it should not delay any more than necessary to ensure alignment with the EU.
Question 12: Do you have any comments on the Impact Assessments?	Confidential? – N No comment.