

Question	Your response
Are there any options that Ofcom has overlooked?	Starlink Services UK Ltd (a subsidiary of SpaceX) welcomes the opportunity to respond to Ofcom's consultation on the future use of the 2 GHz Mobile Satellite Services (MSS) band (1980–2010 MHz and 2170–2200 MHz) from 14 May 2027, when the current authorisation framework expires. Starlink recently completed its acquisition of all of EchoStar's rights to the 2 GHz MSS band globally, with FCC approval granted on 12 May 2026. This positions Starlink as the holder of the most senior ITU filings for this band and well placed to deploy next-generation direct-to-device (D2D) MSS services at scale. While Starlink enters the 2 GHz MSS licensing framework as a new entrant to the commercial D2D market - a market that is itself nascent and rapidly evolving - it does so with the spectrum rights, technical infrastructure, and commercial partnerships necessary to bring next-generation D2D services to UK consumers quickly. Starlink encourages Ofcom to design its framework to support and accelerate this growth, recognising that the UK has an opportunity to be at the forefront of the global D2D market by enabling well-placed new entrants to deploy services without unnecessary regulatory delay. Starlink is already an active participant in the UK market: Starlink Direct to Cell launched in the United Kingdom in partnership with Virgin Media O2, making the UK the first country in Europe to offer a commercial satellite-to-smartphone connectivity service, marketed as 'O2 Satellite'. The service expands Virgin Media O2's UK landmass coverage from 89% to 95%, adding connectivity to an area roughly two-thirds the size of Wales that previously had no mobile signal.

Question	Your response
	Starlink's response is guided by three overarching principles: 1. UK independence: Alignment with the EU over the ITU would be detrimental to the UK's interests. The UK has an opportunity to make independent decisions in relation to this band to position it as a leader in innovation and commercial development. The European Commission's proposed framework is, in Starlink's view, not suited to the UK's post-Brexit regulatory environment or the best use of these scarce resources available to support wider policy initiatives including rural deployment of connectivity and new D2D services. If the UK were to adopt the EC's framework, including fragmenting the 2GHz band into pairings of 5MHz blocks and prioritising an operator's country of incorporation above economic, technical, and regulatory realities, UK users could be left without access to quality direct-to-device satellite service. 2. Enabling innovation during the transitional period: Starlink welcomes renewals for incumbents (i.e. the existing exclusive 2GHz licence holders in the UK) during the interim transitional period. However, a key priority for Starlink is ensuring that the arrangements facilitate ongoing operations during this period to allow incumbents to effectively and efficiently use the spectrum during that period. An extension period without any certainty in relation to incumbent recognition beyond that period substantially hinders the potential use of the spectrum and the potential for innovative development in the UK during that period. Starlink, therefore, encourages Ofcom to consider options that support incumbent recognition beyond the interim period to provide regulatory certainty to incumbents as soon as possible, alongside supporting access to the spectrum by new entrants with demonstrated ability to use the spectrum.

Question	Your response
	3. Global harmonisation: Spectrum fragmentation in the 2 GHz band does not merely create a regulatory inconvenience - it produces concrete and quantifiable harm to coverage, both for the fragmenting jurisdiction and its neighbours. Starlink has carried out studies on cross-border interference effects of the European Commission's proposed plan (on both the EU and extra-EU countries) which demonstrates that the proposal will result in widespread harmful interference outside of the EU (including across the entire territory of the UK) and require extensive service keep out zones which will sacrifice service coverage within the EU itself – <i>please see the EC 2GHz Proposal Interference Study (EC 2 GHz Proposal Interference Study) as ANNEX I to this response</i>. Starlink therefore strongly believes that the appropriate response for Ofcom is to maintain an authorisation framework consistent with the ITU's international coordination obligations, which assign priority on the basis of registered filings rather than geographic or ownership criteria. Using other criteria would undermine the purpose of global harmonization by depriving satellite operators such as Starlink the regulatory certainty needed to achieve economies of scale and deliver reliable, high-performance satellite connectivity at competitive prices. The 2 GHz band's globally harmonised, high-capacity character also makes it uniquely suited to next-generation D2D broadband services - a quality that IoT and other narrowband services do not require and which can be efficiently served by alternative spectrum such as the L-band and sub-GHz MSS allocations - and Ofcom should resist proposals that would fragment the band to accommodate these use cases at the expense of its core utility, with the 2GHz band retained for core D2D use cases. Response to question Starlink agrees with Ofcom's provisional assessment that clearing the band immediately (Options i and ii) would

Question	Your response
	be sub-optimal and supports Option iii - a temporary extension of existing business use - as the most appropriate near-term approach. Alongside this, Starlink encourages Ofcom to consider options that support incumbent recognition beyond the interim period to provide regulatory certainty to incumbents as soon as possible, alongside supporting access to the spectrum by new entrants with demonstrated ability to use the spectrum. Clearing the band without transitional arrangements would require incumbent operators to cease operations immediately upon 14 May 2027, resulting in disruption to ongoing commercial activities and abrupt loss of service for existing UK consumers. This would be contrary to Ofcom's statutory duties, which include promoting competition, encouraging innovation, and furthering the interests of citizens and consumers, and is not in the interests of UK citizens and consumers. However, a transitional framework that entrenches incumbency without creating viable pathways for effective and innovative use of that spectrum and investment in the technology supporting the UK service provision during that period would arguably also be inconsistent with those duties. Therefore, alongside the extension, Starlink encourages Ofcom to consider options that support incumbent recognition beyond the interim period to provide regulatory certainty to incumbents as soon as possible, alongside supporting access to the spectrum by new entrants with demonstrated ability to use the spectrum.
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? – Y / N Starlink supports the proposal to introduce a transitional period. Starlink acknowledges the rationale for continuity of service during a period of uncertainty and agrees that an interim extension period is necessary in the circumstances. As outlined above, Starlink would go further than this and encourage Ofcom to consider options for providing comfort to incumbents as soon as possible in relation to access to the band post such a transition period, to ensure that the band can be effectively and efficiently used in the short term (based on regulatory certainty for the longer term position, which is essential to

Question	Your response
	support nearer term investment and innovation), without prejudice to supporting new entrants as part of any longer term solution.
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 / <u>N</u> Starlink does not oppose Ofcom's preferred three-year fixed period. Noting the need for certainty in the incumbent position in order to make use of the spectrum in the short term, Starlink would strongly support a longer extension period. Starlink considers that a longer extension period would facilitate meaningful longer term planning to ensure that the spectrum does not lie fallow upon the expiration of the existing framework, whilst Ofcom continues to assess emerging evidence on potential future alternative uses. Additionally, a longer period for existing incumbents would facilitate continuity of existing services during that time. Starlink notes that Ofcom's current preference for a three-year period reflects a desire for greater flexibility and to enable a nearer-term decision on the longer-term approach. Starlink supports this flexibility, provided it is exercised in a manner that creates genuine market opportunities while also facilitating effective short term utilisation of the spectrum (supported by near-term certainty on the longer-term approach for incumbents).
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? – <u>Y</u> / N

Question	Your response
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? – Y / N / <u>Partial</u> Starlink supports the proposed alternative authorisation mechanism and does not have substantive comments on this proposal.
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 / <u>N</u> Starlink supports Ofcom's Option 2 - the waiver of CGC licence fees for the duration of the interim authorisation. Ofcom has acknowledged that there have been significant market changes and that there is currently uncertainty regarding the long-term future use of the band, such that the opportunity cost of the spectrum is uncertain.

Question	Your response
	Setting fees at an inappropriate level during a transitional period of significant uncertainty risks distorting the market and creating disincentives to deploy or invest. A fee waiver is a proportionate and practical measure that would support continuity of operations and facilitate innovation. Additionally, Starlink notes that the licensed 2 GHz MSS band adopts a different approach to other substitutable spectrum in the UK - namely the L-band MSS spectrum - which is licence exempt and carries no fee. Introducing or maintaining material fees for 2 GHz MSS during a short-term transitional period, while comparable spectrum remains free, would be anomalous and potentially distortive.
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? – Y / <u>N</u> Starlink supports Ofcom's objective of enabling optimal spectrum use and innovation during the transitional period. However, we would urge Ofcom to apply a rigorous interference threshold before authorising additional users. The condition that additional access must not cause undue interference to existing licensees' services is important and Starlink encourages it to be applied with care, noting that MSS services cannot easily share spectrum in a given location at a given time, and any access mechanism that does not fully account for this characteristic risks creating interference that degrades existing service provision without delivering meaningful benefit to the additional user. We would also note that alternative frequencies are available for several of the use cases most commonly associated with 2 GHz MSS during the transitional period, including IoT services, for which alternative bands (including, for example, certain sub-GHz licensed and satellite bands and licence-exempt SRD spectrum) may be available. Starlink encourages Ofcom to consider whether any additional operators seeking access to the 2 GHz band during the transitional period genuinely require this specific band, rather than directing them to more appropriate alternative spectrum where the risk of

Question	Your response
	interference to existing services, which are most appropriately suited to the band, would not arise.
Question 8: Do you have any other views on the details of our proposal to authorise Viasat and EchoStar during the interim period?	Confidential? – <u>Y</u> / N
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? – Y / <u>N</u> Starlink sets out below its assessment of the technical and operational implications of each of the four long-term authorisation options. Option A – Minimal intervention (ITU filings-led approach) Starlink considers that this approach has significant merit from both a technical and operational perspective and is Starlink’s preferred option. An ITU filings-led approach would be consistent with international framework, reduce coordination complexity, and incentivise efficient spectrum use by the operator best placed to make productive use of the band. Starlink notes that Ofcom has itself acknowledged that market mechanisms can deliver good outcomes in this band, citing the acquisition and joint venture model — including specifically SpaceX’s acquisition of EchoStar’s 2 GHz MSS spectrum access rights — as evidence that competitors can emerge through acquisition to deploy D2D services. Starlink’s acquisition of EchoStar’s spectrum reflects a broader trend across MSS bands, including Amazon’s acquisition of Globalstar’s ITU

Question	Your response
	priority and RocketLab's acquisition of Iridium's ITU priority. At the core of these transactions is access to senior global rights administered at the ITU, which are critical for operators to benefit from the regulatory precedence in international coordination processes afforded by senior filings in a specific spectrum band, enabling reliable global access. Option A is fully consistent with this market-led dynamic, rewarding the operator that has made the most significant commercial, regulatory, and technical investment in this spectrum. In the case of the 2 GHz band in particular, an ITU filings-led approach aligns regulatory priority with the operator that has already demonstrated both the commercial intent and the technical capability to deploy next-generation D2D services (as evidenced by Starlink's existing D2D partnerships with VMO2 and Deutsche Telekom and its detailed technical planning for services using 2 GHz MSS frequencies). A single D2D provider could maximise capacity for D2D services and might allow for higher-capacity D2D services to be delivered in this particular MSS band. Starlink acknowledges Ofcom's concern that a single D2D provider under Option A would prevent in-band competition from another D2D player. However, Starlink considers that this concern is adequately addressed by the competitive constraints from alternative spectrum. Ofcom has itself provisionally assessed that there are other spectrum bands available for each of the four use cases it considers could be delivered using 2 GHz MSS — including L-band and IMT spectrum for D2D services, and 136-137 MHz, 399.9-403 MHz and SRD bands for IoT. Indeed, Starlink's own technical analysis indicates that fragmenting the 2 GHz band to accommodate in-band competition carries concrete coverage and capacity costs, as shared spectrum cannot be used as efficiently as a single contiguous allocation. A single operator holding 2 x 30 MHz of contiguous spectrum would be able to deliver significantly higher capacity D2D services - including voice, messaging and high-speed data for a greater number of users - than two operators each holding 2 x 15 MHz with an associated guard band requirement.

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	Trading in-band competition for this degree of spectral efficiency loss is, in Starlink's view, a poor trade-off for UK consumers. Option B – Retain status quo but introduce scope for trading If Option A is not available, Starlink views this approach as the next most preferred option of those put forward by Ofcom. Starlink notes that Ofcom's own provisional view is that continuing to authorise two operators each holding a 2 x 15 MHz allocation would effectively balance spectrum efficiency, capacity for D2D/IFC type services, and competition, with scope for IoT access to guard bands. Option B is consistent with this analysis and, in the context of recent market developments, would in practice reflect the outcome that the market has itself produced: SpaceX/Starlink and Viasat are already the two incumbent operators, having each invested significantly in this spectrum and in the services they intend to deliver using it. Ofcom authorising these two operators on a tradeable basis for the long term would therefore closely replicate a market-led, efficiency-maximising outcome without the delay and cost of a competitive process. However, Starlink has concerns about the bandwidth allocation under this approach. Since the European Commission is proposing a bandwidth split of three lots of 2 x 10 MHz, this proposal would not automatically align services by bandwidth. Starlink's preference is for a 2 x 15 MHz allocation to ensure that next-generation D2D services can be deployed with maximum capacity and service quality. Starlink notes that several stakeholders, including EchoStar and Vodafone/AST SpaceMobile, have suggested that 2 x 15 MHz may be necessary for a viable D2D service, reflecting the technical reality that higher bandwidths enable voice, messaging and high-speed data for a larger number of users. Option C – UK-led process

Question	Your response
	Starlink does not oppose a UK-led process in principle but raises the following concerns. First, any competitive process should give appropriate weight to ITU priority filings. The practical ability of an authorised operator to provide services will be materially affected by its ability to coordinate with senior filing holders. A process that awards spectrum to an operator unable to reach coordination agreement with the senior filing holder would risk creating a licensee with limited practical ability to deploy services, contrary to Ofcom's statutory objective of optimal spectrum use. Second, administrative allocation aligns with existing policies that have facilitated deployed and successful satellite services under apparatus licences, whereas auction and price-based allocations for satellite rights have never been used in a successful satellite allocation anywhere in the world. An auction could result in spectrum hoarding by speculators or exclusive acquisition by a single MNO to deny competitors access, delaying or preventing service to UK citizens. Option D – Alignment with the European Union Starlink urges Ofcom not to adopt an approach that effectively imports the European Commission's proposed framework into the UK. Alignment with the European Commission, especially without technical clarity on the feasibility of their proposal, over the ITU would not be in the UK's interests and the UK has an opportunity to follow an independent path to make the best use of this spectrum. The European Commission's proposals restrict procedures (1) and (2) to EU-owned or EU-controlled operators only, with procedure (3) - the only procedure open to third-country applicants such as SpaceX - subject to specific security conditions. Adopting this approach in the UK would effectively shut third-country applicants out of two of the three authorisation processes, contrary to Ofcom's duties to promote competition and optimal spectrum use.

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	Furthermore, the European Commission proposes three distinct selection procedures with 2 x 10 MHz available under each. Splitting the band into three blocks of 2 x 10 MHz would reduce spectral efficiency and limit capacity. A two-operator structure each holding 2 x 15 MHz is likely to better serve UK consumers. Starlink notes that Ofcom itself has acknowledged the risks associated with full EU alignment, observing that a full or very extensive alignment with the EU would involve allocating some or all of the spectrum to the same parties and would likely introduce additional delay and timing uncertainty in the longer-term UK allocation process. Starlink supports this assessment. The UK should not allow its long-term spectrum decisions to be held hostage to the EU's timetable, particularly when the EU's proposed framework contains operator eligibility restrictions that would be inconsistent with Ofcom's own competition duties and incompatible with the UK's post-Brexit regulatory independence. Starlink acknowledges that alignment with the EU may be beneficial for device ecosystem development and cross-border coordination, but should be understood in terms of technical standards and frequency band harmonisation (i.e., both the UK and EU using the 2 GHz MSS band for the same types of services) rather than in terms of operator selection or ownership criteria.
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? – Y / N For the reasons set out in Starlink's response to Question 9, Starlink's preferred approach for long-term authorisation is Option A - the minimal intervention (ITU filings-led) approach. This approach is most consistent with the global ITU framework and incentivises productive spectrum use by the operator best placed to deploy services in the band. If Ofcom does not adopt Option A, Starlink would encourage Ofcom to consider a hybrid approach using ITU filing priority as the primary criterion for authorisation,

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	while also considering deployment conditions, open-access obligations, and interference coordination, as further described in Starlink's response to Question 11.
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? – Y / <u>N</u> In addition to the technical and operational considerations set out in Starlink's responses to Questions 9 and 10, Starlink highlights the following further factors for Ofcom's consideration. Open access and competition Starlink urges Ofcom to ensure that any long-term authorisation framework include open-access obligations, requiring the licensee to offer access to all interested MNOs and government agencies on fair, reasonable and non-discriminatory terms. Starlink is committed to offering an open-access service available to all interested mobile network operators and government agencies, rather than working exclusively with certain carriers. This commitment distinguishes Starlink's approach from that of other potential operators, and Starlink encourages Ofcom to consider how to embed open-access principles in the long-term framework to maximise benefits to UK consumers. Deployment conditions and anti-hoarding measures The history of hoarding MSS spectrum is well documented. Starlink's view is that any future authorisation framework should impose use-it-or-lose-it conditions and require demonstration of relevant ITU satellite filings - taking into account the priority attached to each filing - to ensure that spectrum is allocated to those best placed to deploy productive services for UK consumers. UK Government's Statement of Strategic Priorities The current Statement of Strategic Priorities recognises the value of the space sector to UK GDP, supporting growth across key sectors including satellite communications, and calls on Ofcom to apply a spectrum management approach which supports innovation and investment. Authorising Starlink to access the 2 GHz MSS band would directly advance these priorities, given Starlink's proven track record of investment in UK satellite services

Question	Your response
	and its commitment to open-access, next-generation D2D connectivity for British consumers.
Question 12: Do you have any comments on the Impact Assessments?	Confidential? – <u>Y</u> / N