

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 UKspace welcomes Ofcom's consultation on the future management of the 2 GHz MSS band. The expiry of the current authorisations presents an opportunity to establish a regulatory framework that reflects the changing role of satellite communications and supports the UK's long-term economic, technological and security ambitions. The consultation recognises that MSS are evolving rapidly. This evolution encompasses a much wider range of services than D2D alone, including NTN integration, IoT and machine-to-machine applications, aeronautical and maritime connectivity, enterprise and government communications, and other future MSS use cases. Alongside evolving 3GPP standards, developments within the European Union and the forthcoming World Radiocommunication Conference (WRC-27), these changes reinforce the need for a framework that balances long-term certainty with sufficient flexibility to respond to future developments. UKspace agrees that the options identified by Ofcom provide an appropriate basis for discussion. However, we believe the long-term framework should be guided by broader strategic principles than spectrum management alone. The 2 GHz MSS band should be recognised as a strategic national asset that supports economic growth, national resilience and the continued development of the UK space sector. MSS are already an integral part of communications infrastructure and their role will expand as services evolve. Future use of the 2 GHz MSS band should not be framed principally around handheld communications. The band can support a broad range of consumer, enterprise, government, transport, IoT, machine-to-machine and resilience applications, including D2D, NTN and hybrid terrestrial-satellite networks. Future decisions should therefore support four overarching objectives: encouraging long-term investment, strengthening national resilience,

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	promoting innovation and maintaining the UK's international competitiveness across the full range of evolved MSS services. UKspace agrees that prolonged underutilisation of the band would represent a missed opportunity. Demand for satellite-enabled communications continues to grow, while investment in next-generation satellite systems and D2D services is accelerating worldwide. The regulatory framework should therefore encourage productive use of the spectrum throughout any transition period, enabling existing live services to grow and evolve, as well as supporting research, technology demonstration and commercial innovation. International coordination will also remain important. Satellite services operate across national borders and benefit from internationally harmonised standards that promote interoperability, investment and economies of scale. UKspace supports Ofcom's continued engagement through the ITU, CEPT and other international forums. However, harmonisation should not become an objective in itself. The UK should retain sufficient flexibility to pursue regulatory approaches that support domestic investment and national priorities while maintaining compatibility with international standards. UKspace firmly believes that the UK, considering its esteemed status in CEPT and ITU, could consider actively driving this decision, including promoting decisions, which, considering the interconnected nature of spectrum policy, the EU may have to follow. Developments within the European Union also require careful consideration. Proposed reforms to the EU MSS framework, together with initiatives such as the Digital Networks Act, IRIS² and the EU Space Act, demonstrate that spectrum policy is increasingly being used to support EU industrial competitiveness, security and technological sovereignty. The UK should continue to engage constructively with these developments while maintaining an independent framework that supports UK industry and preserves access to international markets. Finally, the future framework should recognise the long investment cycles associated with satellite infrastructure. Investors require confidence that spectrum access arrangements will remain predictable and transparent

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	over many years. Regulatory certainty is therefore essential to encouraging continued investment across the UK space sector. UKspace recommends that the future management of the 2 GHz MSS band should maximise the strategic value of this nationally important spectrum resource, provide long-term regulatory certainty, encourage innovation in emerging satellite communications technologies, maintain international compatibility while preserving UK regulatory flexibility, strengthen national resilience and reinforce the United Kingdom's position as a leading global space nation. These principles underpin UKspace's responses to the remainder of this consultation.
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 UKspace supports Ofcom's proposal to establish a transitional authorisation period following the expiry of the existing 2 GHz MSS authorisations in May 2027. A managed transition is the most proportionate approach to maintaining continuity of service while allowing time for regulatory, technological and international developments to mature. The current licences expire at a time of significant change within satellite communications. D2D services are approaching commercial deployment, NTN continue to evolve through 3GPP standards, preparations are underway for the WRC-27, and both the UK and European Union are considering future regulatory frameworks. In this environment, maintaining continuity is preferable to introducing fundamental regulatory change before the international landscape has stabilised. UKspace's support for a transition period is based on more than regulatory certainty. It is essential to preserve strategically important satellite capability, protect long-term investment and maintain national resilience. Existing satellite systems represent substantial investment in spacecraft, ground infrastructure and operational capability, supporting government, defence, aviation, maritime, emergency services, enterprise communications and Critical National Infrastructure. An abrupt change in

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	authorisation arrangements would introduce unnecessary commercial and operational risk while providing limited strategic benefit. The transition period should also reinforce investor confidence. Satellite programmes are planned and financed over many years, requiring a stable and predictable regulatory environment. Continuity benefits not only incumbent operators but also manufacturers, launch providers, technology developers, infrastructure companies and investors across the wider UK space sector. At the same time, the transition should not be viewed as simply an administrative extension. It should be used to prepare the UK for the next generation of satellite communications by supporting research, technology demonstrations, D2D trials and other innovation activities where these can be undertaken without harmful interference to existing services. This will help ensure that UK industry remains internationally competitive as new satellite communications markets develop. The transition should also provide Ofcom with the opportunity to gather the technical and commercial evidence needed to inform long-term decisions, including developments in D2D and NTN technologies, international regulatory frameworks, equipment ecosystems, coexistence studies and future demand for resilient communications. UKspace therefore supports a defined transition period that preserves existing capability, provides regulatory certainty, encourages innovation and enables evidence-based development of the long-term framework. This approach offers the best opportunity to maximise the long-term value of the 2 GHz MSS band while supporting investment, resilience and the continued growth of the UK space sector.
Proposal for interim transition period	

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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 UKspace supports a defined interim authorisation period but is not convinced that a fixed three-year transition will necessarily provide sufficient time for the sector's strategic, technological and regulatory uncertainties to mature. Rather than being driven by an arbitrary timetable, the duration should reflect the readiness of the market and provide a robust evidence base for long-term licensing decisions. Satellite infrastructure operates on much longer investment cycles than terrestrial communications. Satellite programmes typically take five to ten years to develop and remain operational for well over a decade. Investors therefore require a stable and predictable regulatory environment that supports long-term planning and commercial confidence. The transition also coincides with significant international developments, including the evolution of D2D and NTN technologies, ongoing work within 3GPP and CEPT, preparations for WRC-27 and the development of a new European regulatory framework for Mobile Satellite Services. These developments will influence future spectrum requirements, equipment ecosystems and licensing models, and should be allowed to mature before permanent decisions are taken. UKspace believes the transition should be used proactively to gather the technical and commercial evidence needed to inform the long-term framework. This includes monitoring technology deployment, market demand, coexistence studies, international regulatory developments and future Government requirements for resilient communications. It will be important to ascertain how existing and newer services work together and to evaluate the importance of vertical versus horizontal integration. Future band plans must take up to date co-existence studies into consideration and these studies should be technology and service neutral. For these reasons, UKspace considers that a transition period of up to five years may better reflect satellite investment cycles and the pace of international change than a fixed three-year period. The period should also allow Ofcom to understand how different future uses of

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	the band interact with wider IMT developments, including the implications for the competitiveness of MSS-based D2D and IoT services. Whatever duration is ultimately adopted, the objective should be to preserve strategic capability, maintain investor confidence, encourage innovation and establish a robust foundation for the long-term management of the 2 GHz MSS band.
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 UKspace broadly supports Ofcom's proposed authorisation framework. Retaining existing licensing arrangements provides continuity for operators and users, minimises implementation risk and maintains confidence while the long-term regulatory framework is developed. Timely implementation will be essential. Industry requires certainty well before the expiry of the current authorisations to support operational planning, customer commitments and investment decisions. UKspace therefore encourages Ofcom to finalise the necessary regulatory arrangements at the earliest opportunity. While continuity is important, the interim framework should also be sufficiently flexible to accommodate emerging technologies. Satellite communications are evolving rapidly, with D2D, NTN and integrated terrestrial-satellite services becoming an increasingly important part of future communications infrastructure. The regulatory framework should enable these developments while maintaining stability for existing services. UKspace also agrees that protecting incumbent services from harmful interference must remain a fundamental principle. Future decisions should continue to be informed by robust technical analysis, co-existence studies, appropriate coordination and internationally recognised technical standards. The last relevant coexistence studies took place in 2006. The interim arrangements should preserve the integrity of existing services while Ofcom develops the evidence required for the long-term framework.

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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 Given the temporary nature of the proposed transition period, UKspace is not persuaded that introducing an entirely new licensing framework would deliver sufficient benefits to justify the additional regulatory complexity. One of the principal objectives of the transition should be stability. Introducing fundamentally different regulatory mechanisms during an interim period risks increasing uncertainty for operators, investors and customers at precisely the point where continuity is most valuable. We therefore consider that retaining arrangements closely aligned with the existing framework represents the more proportionate approach. The UK space sector benefits from regulatory frameworks that are transparent, proportionate and internationally respected. The transition period should preserve these characteristics. Creating new licensing products immediately before a comprehensive review of long-term arrangements risks generating unnecessary administrative burden while potentially influencing future market behaviour in unintended ways. UKspace therefore encourages Ofcom to reserve more fundamental regulatory reform for the subsequent long-term authorisation process.
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 UKspace considers that the fee arrangements during the interim period should, as far as practicable, continue on a business-as-usual basis. The purpose of the transition is to maintain continuity while the long-term framework is developed; it should not be used to create additional revenues. Maintaining a stable and proportionate fee regime during the interim period will reduce unnecessary uncertainty for operators and customers and avoid prejudging the approach that Ofcom may ultimately adopt for long-term authorisation. Any fundamental review of spectrum fees should be undertaken as part of the long-term authorisation process, when the future licensing model and associated rights and obligations are clearer. This will allow fee policy to be considered in the round once

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	all the key parameters are known rather than being determined prematurely during a temporary transition.
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 UKspace supports the principle of enabling additional users to access the spectrum during the interim period where this is technically feasible and does not compromise existing services. However, any such access needs to reflect the practical experience of attempts to accommodate additional use of the band, including the technical, coordination and commercial constraints that can arise. The transition period can support innovation, but additional access should not be assumed to be straightforward or cost-free for incumbent operators. The UK has an internationally recognised satellite innovation ecosystem encompassing universities, Catapults, SMEs, manufacturers, software companies and satellite operators. Providing opportunities for these organisations to develop and demonstrate new technologies during the transition period will contribute directly to future economic growth. UKspace encourages Ofcom to establish a clear framework supporting: • D2D technology trials; • NTN demonstrations; • satellite-enabled IoT services; • advanced user terminal development; • resilient communications technologies; • integrated terrestrial-satellite applications; • and future 6G research. These activities should be supported through transparent authorisation processes that provide innovators with confidence while protecting incumbent services. The objective should be to ensure that the transition period actively prepares the UK for the next generation of satellite communications rather than simply maintaining existing operations. Current providers play a crucial role in promoting innovation in the sector and can provide a stable environment for a wider variety of innovative solutions. Innovation should not compromise the integrity

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	of existing services. Any additional access should therefore remain subject to: • robust interference analysis; • appropriate coordination procedures; • internationally recognised technical standards; • and effective protection of incumbent operators. This balanced approach will encourage innovation while maintaining confidence in the UK's spectrum management framework.
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 UKspace considers that the interim authorisation should remain focused upon continuity rather than substantive regulatory reform. The conditions attached to the transition should provide certainty for operators while avoiding measures that could unintentionally influence the subsequent long-term authorisation process. Equally, the transition period should be used proactively to develop the technical, commercial and regulatory evidence that will underpin future decisions. This includes continued monitoring of: • market demand; • technological developments; • equipment ecosystems; • international regulatory changes; • coexistence studies; • security considerations; • and future Government communications requirements. The stronger this evidence base becomes during the transition period, the more robust the eventual long-term licensing framework will be. The transition should be characterised by four guiding principles: Continuity — preserving existing services and protecting strategically important satellite capability. Certainty — providing regulatory stability that supports long-term investment throughout the UK space sector. Innovation — enabling research, trials and technology development that prepare the UK for future Direct-to-

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	Device, Non-Terrestrial Network and integrated communications services. Evidence — using the transition period to build the technical and commercial understanding necessary for informed long-term spectrum policy. Taken together, these principles will ensure that the interim authorisation period acts not simply as a bridge between licensing regimes, but as an active programme of preparation for the future evolution of satellite communications in the United Kingdom.
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 UKspace recognises that each of the four approaches described by Ofcom offers advantages and disadvantages. No single option is without compromise. The preferred approach should therefore be judged against a broader set of strategic objectives than spectrum management alone. In particular, UKspace believes that the future framework should be assessed according to its ability to: • support long-term private investment; • strengthen national resilience; • encourage innovation; • maximise efficient spectrum utilisation; • maintain international interoperability; • support competition; • and reinforce the United Kingdom's position as a leading global space nation. These objectives should form the basis against which each option is evaluated. The satellite sector is fundamentally different from terrestrial telecommunications. Satellite operators make investment decisions decades before revenues are realised. Manufacturers establish production capability over many years. Launch opportunities are planned long in advance. Ground infrastructure requires substantial capi-

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	tal expenditure. The regulatory framework therefore becomes an integral component of the investment environment. A framework that introduces unnecessary uncertainty risks discouraging investment not only by satellite operators but throughout the wider UK space economy. Conversely, predictable long-term regulation provides confidence for investors while encouraging innovation and technological development. UKspace therefore considers long-term regulatory certainty to be one of the most important outcomes of this consultation. The Framework Must Be Technology Neutral The communications sector continues to evolve rapidly. Future services may include: • D2D communications; • integrated terrestrial and satellite mobile networks; • autonomous transport systems; • machine-to-machine connectivity; • advanced IoT applications; • resilient emergency communications; • and future 6G architectures. It would therefore be inappropriate for the regulatory framework to favour particular technologies or business models. Instead, the framework should remain sufficiently flexible to accommodate innovation while continuing to ensure efficient spectrum use. Technology neutrality has historically been one of the strengths of UK communications regulation and should remain a guiding principle. Competition and Efficient Spectrum Use The long-term framework should support effective competition and efficient spectrum use, but the number of authorised operators should not be treated as an objective in itself. Fragmenting the available spectrum too far could reduce the bandwidth available to each operator, constrain service capability and create pressure for compensating spectrum assignments elsewhere. Ofcom should therefore assess competition alongside service quality, spectrum efficiency, investment incentives and

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	the practical requirements of viable MSS operations. Predictable regulation remains essential to sustaining investment and innovation. International Coordination Remains Essential Satellite communications are inherently international. Operators routinely provide services across multiple jurisdictions while relying upon internationally harmonised technical standards. UKspace therefore supports continued close engagement with: • the International Telecommunication Union; • CEPT; • 3GPP; • and other international standards bodies. International interoperability supports: • larger equipment ecosystems; • lower equipment costs; • cross-border service delivery; • international investment; • and more efficient spectrum utilisation. These benefits should remain important considerations in developing the long-term UK framework. The European Context Developments within Europe require careful consideration because decisions taken there could materially reshape the competitive landscape for 2 GHz MSS. The European Commission's proposed reforms to MSS create a credible possibility that substantial spectrum rights – up to 2/3 of the available 2x30 MHz – could be awarded to an operator without a significant UK industrial presence and then carried forward over a 40-year period. More broadly, initiatives including the Digital Networks Act, IRIS², the proposed EU Space Act and wider technological sovereignty measures demonstrate that Europe increasingly views satellite communications as both EU strategic infrastructure and EU industrial capability. UKspace believes that the United Kingdom should use its regulatory independence proactively. The UK has an opportunity to shape an approach that protects productive use of the band, supports UK investment and provides a credible model for wider European discussion, including

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	through CEPT. The UK should seek the highest practicable degree of technical interoperability with neighbouring markets, but should not simply mirror an EU outcome where that would weaken UK competitiveness or lock in an allocation that does not serve UK interests. The objective should therefore be UK leadership combined with international compatibility, rather than uniformity for its own sake.
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 Rather than expressing a preference for one of the four options in isolation, UKspace believes that the optimal long-term framework should combine the strongest elements of several approaches. Specifically, the future framework should: • provide long-term regulatory certainty; • support international interoperability; • encourage competition; • maintain efficient spectrum utilisation; • facilitate innovation; • and remain sufficiently flexible to accommodate future technological developments. This hybrid approach would provide greater resilience against future market uncertainty than a framework built around any single regulatory philosophy. UKspace encourages Ofcom to consider adopting an outcomes-based approach when designing the future framework. Rather than focusing primarily upon licensing structures, the framework should seek to maximise outcomes including: • increased investment; • improved resilience; • enhanced innovation; • wider consumer benefit; • stronger industrial capability; • and international competitiveness. As dependence upon digital connectivity continues to increase, resilient satellite communications will become an

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	increasingly important component of Critical National Infrastructure. This wider strategic role should inform future regulatory decisions.
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 UKspace would encourage Ofcom to consider several additional strategic factors when developing the future framework. Long-Term Licence Duration Given the exceptionally long investment cycles associated with satellite infrastructure, longer licence durations provide greater certainty for investors. Predictable long-term access to spectrum encourages investment in satellites, manufacturing capability, software development and supporting infrastructure. National Resilience Future licensing arrangements should explicitly recognise the contribution of commercial satellite communications to national resilience. Commercial capability increasingly complements Government systems and provides additional flexibility during periods of disruption. This contribution is likely to grow as D2D services become more widely deployed. Security Cyber security, supply chain resilience and secure communications are becoming increasingly important within satellite communications. Future licensing arrangements should support these objectives without imposing unnecessary barriers to innovation or investment. Skills and Innovation The UK's leadership in satellite communications depends upon maintaining world-class engineering, manufacturing and research capability. Regulatory certainty contributes directly to investment in skills, research and development, universities and supply chains. The long-term framework should therefore support the continued growth of the UK's innovation ecosystem. International Competitiveness

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	The United Kingdom competes internationally for satellite investment. An internationally respected, predictable and innovation-friendly regulatory framework will strengthen the UK's attractiveness for future satellite programmes. This should remain one of Ofcom's long-term objectives. UKspace recommends that the long-term framework should: • provide regulatory certainty consistent with satellite investment cycles; • remain technology neutral; • encourage innovation and competition; • maintain international interoperability while preserving UK regulatory flexibility; • strengthen national resilience; • support the UK's industrial strategy and growth ambitions; • encourage inward investment; • recognise Mobile Satellite Services as strategic national infrastructure; • and reinforce the United Kingdom's position as one of the world's leading space nations. Taken together, these principles will create a future-proof regulatory framework capable of supporting the continued evolution of Mobile Satellite Services while delivering lasting benefits for the UK economy, national security and society.
Question 12: Do you have any comments on the Impact Assessments?	Confidential? – N No