

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 Viasat supports Ofcom's proposal to maintain continuity of existing use of the 2GHz MSS band following expiry of the current authorisations in May 2027. Ofcom is already familiar with the European Aviation Network (“EAN”), which is currently operated by Viasat using 2GHz MSS spectrum. The EAN is a live and heavily utilised communications network delivering services across the United Kingdom and Europe. Since commercial launch in 2019, Viasat and its partners have invested more than [CONFIDENTIAL] in space, air and ground infrastructure supporting the EAN, including a dedicated satellite component, more than [CONFIDENTIAL] Complementary Ground Component (“CGC”) stations across Europe and a growing installed base of aircraft. The network currently supports almost [CONFIDENTIAL] aircraft. Continued demand growth is being driven by increasing passenger expectations and the transition by many air-lines towards free or freemium connectivity offerings. [CONFIDENTIAL] Viasat respectfully requests that Ofcom ensure that the 2GHz MSS spectrum that Viasat currently uses productively and efficiently, providing valuable services to UK customers, businesses and end-consumers throughout the UK, will remain available for such use without interruption. This result would advance Ofcom’s policy objectives and ensure that it can meet its duties and obligations. If Ofcom decides to materially alter the existing 2GHz MSS framework in the UK, it should provide a reasonable transition period, the length of which should reflect (a) Ofcom’s expectation of when it will be able to award the spectrum and (b) the awardees’ ability to meet their obligations to provide a service in expeditious fashion (starting immediately for the benefit of customers and for the long term). Stated differently, the structure of any interim solution (addressed in Questions 1 through 8) is inextricably linked with the structure of any longer-term solution (address in Questions 9 through 12); neither can be considered in isolation. For example, if Ofcom were to maintain the status quo and select Viasat as a licensee in the 2GHz MSS band in the UK, a transitional period might not be required at all (or could be shorter). If, on the other hand, Ofcom were

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	to delay implementation of a new framework in the hope of further alignment with the EU process, even a five-year extension of the right to use the spectrum might be too short—especially considering the significant uncertainty on the feasibility of the EU’s 2GHz MSS proposal¹ (the “proposed Regulation”) in the EU as well as a non-CEPT harmonised band plan with unclear co-existence environments. Allowing existing authorisations to lapse without a successor framework would create a material risk that valuable spectrum would remain underutilised or fallow for an extended period whilst alternative arrangements, systems and services are developed. This would be to the detriment of customers, businesses and end-consumers across the UK who currently utilise the services provided. In particular, the development of MSS systems requires substantial upfront capital investment and ongoing funding; conceptualising, building, launching the satellites and the putting into service of a sufficiently large constellation can take a decade or more. Viasat therefore supports an approach which preserves the continuity of existing services for UK customers, businesses and end-consumers, recognises the value of the investment from Viasat and Viasat’s legitimate expectations in this regard, maintains regulatory certainty - including to allow continued investment - and enables future MSS and NTN evolution while longer-term arrangements continue to be considered. Viasat should be allowed to continue to use the spectrum and continue, with clarity and certainty, to develop its services, innovate and invest, in the UK, the EU and internationally. A transition period, which Viasat supports, should be of a duration of no less than five years, considering (a) [CONFIDENTIAL], (b) the time it takes to implement the new allocations of spectrum following the World Radiocommunications Conference 2027 (“WRC27”) on Agenda Items 1.12, 1.13 and 1.14, which will significantly reduce the competitive pressure on the 2GHz MSS band, (c) the ongoing proceedings at an EU level, which could drag on, and be delayed, significantly

¹ European Commission (2026), Proposal for Regulation of the European Parliament and the Council on the procedure for authorisation of systems providing mobile satellite services using the harmonised 2 GHz frequency band and repealing Decision No 626/2008/EC, last accessed 05.08.2026: [here](#).

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	longer than five years and (d) the publicly stated earliest entry into service dates of a number of the future potential operators of this spectrum in both the EU and 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.	Confidential? – N No. Viasat agrees that a transitional authorisation period represents the most proportionate means of balancing continuity of service and the efficient use of spectrum. However, proposing a specific timeframe, whether three or five years, absent a clear plan on a future authorisation framework creates further uncertainty. Specifying support for either a three or a five-year period could thus have significant adverse consequences, including, but not limited to, interference in operations between the EU and the UK or insufficient coverage in EU-UK border regions to avoid interference. Therefore, depending on the future approach chosen by Ofcom, the timeframe for such an extension should be flexible. As outlined in response to Question 1 the EAN currently delivers services relied upon by airlines and millions of passengers throughout Europe, including flights entering, departing from and operating within UK airspace. A time-flexible transitional arrangement of no less than five years would: • limit unnecessary disruption to these services while preserving the significant benefits already being delivered through the EAN. Those benefits include improved passenger connectivity, increased productivity, support for the wider UK space sector and efficient use of spectrum through the integrated MSS and CGC architecture. Therefore, a longer transition period synchronised with a clear fixed way forward would reduce regulatory uncertainty for existing users, support efficient spectrum use and avoid creating unnecessary risks to a growing service which already delivers significant consumer benefits, including across the UK.

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	• avoid creating uncertainty at a time when broader European and international discussions concerning the future use of the 2GHz MSS band remain ongoing. Regulatory certainty remains essential to support continued investment, network optimisation and future innovation. • allow the UK to reflect whatever the outcome of the WRC27 with regard to Agenda Items 1.12, 1.13 and 1.14 and the potential new allocations available as a consequence thereof. During such a transitional arrangement Viasat should have continued access to 2x15 MHz. The transitional arrangement should be technology and service neutral, meaning that it should be allowed for Viasat to use the system in its current configuration, as well as to provide new services. As has been presented in previous submissions, continued access to 2x15 MHz remains necessary considering the growing number of customers and their increasing demand.
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 No. Although Viasat agrees that a transition period would be sensible in principle, a three-year transition period would be too short. As outlined in response to Questions 1 and 2, any timeframe chosen now needs to be compatible with and conducive to a future authorisation regime. [CONFIDENTIAL]
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 Yes. Viasat supports Ofcom's proposal to preserve, as far as possible, the existing authorisation framework during the transitional period (a) to minimise further regulatory uncertainty, (b) to minimise legal and operational disruption, and (c) to avoid any unnecessary redesign or re-licensing burden.

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	The existing framework has also demonstrated its ability to support innovation and efficient spectrum use. As recognised by competent legal and judicial authorities, integrated MSS and CGC architectures provide significant efficiency benefits and enable service quality that would not be achievable through satellite-only architectures. Accordingly, Viasat believes that continuing the existing authorisation model is much preferable to introducing a substantially different framework during an interim period, along with all of the associated uncertainties and risks.
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 Viasat does not believe that it would be appropriate to introduce a fundamentally different licensing model during the proposed transitional period. The principal objective of the transitional period should be to ensure the continuity of existing services, for the benefit of UK customers, businesses and end-consumers, and the efficient use of spectrum. Introducing a new licensing structure would create additional regulatory uncertainty at precisely the point where stability is most needed. As Viasat has previously explained, substantial investments have already been made in reliance upon the existing framework. Those investments support live services and a growing customer base. Any unnecessary changes to the underlying regulatory structure risk delaying investment decisions, complicating future planning, innovation and reducing the predictability needed to support continued deployment, endangering the legal certainty of rights, upending the integrated MSS/CGC architecture, and undermining the principles of technological and service neutrality.
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 Viasat supports Ofcom’s decision to waive CGC fees during the transitional period, given the regulatory uncertainty, which Ofcom itself has recognised, and the transitional character of the temporary extension. Viasat continues to invest in the development of the EAN and in future NTN capabilities to be deployed alongside

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	existing MSS services. Maintaining an investment-friendly environment during the transition period is therefore particularly important. A waiver of fees provides significant investment clarity, particularly as (increased) fees may discourage (a) network upgrades and innovation, (b) the replacement space segment, and (c) future advanced MSS service development.
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 No. The primary objective of the interim period should be to preserve the <i>status quo</i> and the important continuity of existing services while longer-term policy arrangements are developed. The 2GHz MSS framework was specifically designed around coordinated MSS systems operating on assigned spectrum. Viasat has previously explained that the co-frequency, co-coverage operation of independent MSS systems is inherently problematic and that the integrated management of satellite and terrestrial components is critical to manage interference risks and ensure that services can be provided. Introducing additional operators during an interim period risk creating technical, regulatory and operational complications that could undermine the very continuity objectives the transitional arrangement is intended to achieve. It should be noted that, contrary to technical co-existence work performed prior to the last MSS framework in CEPT Report 013 in 2006, no equivalent co-existence studies have been performed to understand the possible interference environment between services offered in the 2GHz MSS band and/or adjacent bands. These studies are critical to ensure that appropriate measures of radio interference management and coexistence with other relevant wireless systems within the band and adjacent bands are put in place. Such studies are particularly important considering the changes in the spectrum environment in adjacent bands following the upcoming WRC27, as mentioned in response to Questions 1 and 2.

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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 N/A
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 Viasat has a strong preference for Option B, “Status quo plus trading”, as explained below. Such an approach has the clear advantages that it (a) protects the continuity of services and the substantial investments made, (b) allows market evolution, (c) supports spectrally efficient outcomes, (d) enables growth, and (e) importantly supports UK policy objectives. In assessing long-term options, Ofcom should prioritise two principles. First, continuity of existing services offered by Viasat should remain an important consideration. Existing MSS services already deliver substantial benefits to UK customers, businesses and end-consumers and should not be disrupted. Second, Ofcom should continue to recognise the wider regional nature of Viasat’s MSS satellite communications services, in particular as these pertain to the provision of different services, including in-flight connectivity. As a leader in CEPT, the UK has an opportunity to influence policies adopted by Europe and its Member States, as well as non-EU CEPT members. Viasat notes that option B has significant advantages over other options: • Option B would best allow Viasat to help drive the growth of the UK space industry. Among other things, Viasat could continue to operate its 2GHz MSS network in reliance on a UK space station authorization and ITU network filing made through the UK. This, and Viasat’s broader rela-

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	tionship with the UK, would promote investment, innovation, jobs, and growth throughout the UK. The current pan-European band plan could remain intact. Notably, the EU has proposed an approach that would undermine the CEPT voluntary harmonisation (as reflected in CEPT Report 013, ECC Decision (06)09 and (06)10, ECC Report 197 and ECC Report 233) by replacing a band plan of 2x2x15 MHz with a much more complicated future band plan of 3x2x10 MHz (or potentially more granularly even 2x10 MHz, 3x2x5 MHz and 5x2x1 MHz of a consortium for several IoT players). This approach, which would be imposed on the 27 EU Member States and the other 19 non-EU CEPT members, would undermine harmonisation and set a dangerous precedent—particularly absent any clarifying specifications on requirements for future systems or co-existence studies based on such specifications. Preserving the current pan-European band plan would lead to fewer efficiency losses. The 5G New Radio standard² specifies guard bands depending on the channel bandwidth and the sub-carrier spacing (SCS) of relevant communications channels. Any action that further reduces the channel bandwidth, such as the proposed Regulation’s permutations of 3x2x10 MHz, including (a) 2x10 MHz and 4x2x5 MHz, (b) 2x2x10 MHz and 2x2x5 MHz, as well as (c) 2x10 MHz, 3x2x5MHz and 5x2x1 MHz would lead to significant efficiency losses as a result of additional guard bands³. Preserving the current band plan would ensure a more “future proof” framework. Maintaining the current band plan of 2x2x15 MHz has a higher chance of enabling meaningful services in

² ETSI (2024), Technical specification, 5G; NR; User Equipment (UE) radio transmission and reception; Part 5: Satellite access Radio Frequency (RF) and performance requirements (3GPP TS 38.101-5 version 18.5.0 Release 18), page 16, last accessed 06.08.2026: [here](#).

³ In addition to less efficient spectral usage due to additional guard band requirements, splitting the band into smaller channel bandwidths introduces significantly more instances of control-channel, synchronisation, and carrier-management overhead associated with operating multiple narrow carriers.

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	the future, considering 6G or 7G standards may require larger minimum bandwidths, which 2x10 MHz may be too small for. Preserving the existing legal framework would advance the principles of technological and service neutrality. The proposed Regulation would force operators to follow a “deployment path” to D2D as a requirement in the second selection stage. This constitutes a significant divergence from existing UK and European policy approaches, which recognize the value of ensuring technological and service neutrality in applicable regulatory frameworks. Notably, Ofcom has supported the need to promote flexibility to use spectrum for MSS services more widely, including, but not limited to, D2D (and IoT)^{4 5}. Ofcom has also highlighted the need for large contiguous band channels of no less than 2x15 MHz per operator to ensure that operators have the flexibility to make their own choices in designing services and operations—instead of having outcomes effectively dictated to them by the regulatory framework^{6 7}. This is also supported by the European Commission’s summary of its targeted consultation on 2GHz MSS⁸. Viasat strongly encourages Ofcom to continue to maintain its current approach on technology and service neutrality to enable innovation. Such neutrality will ensure that any framework is future-proof and relevant, particularly considering standards evolution. In other words, if similar license terms to the EU were chosen, i.e., 2x20 years, then any band plan chosen now needs to be relevant also in 40 years.

⁴ Ofcom (2024), Improving mobile connectivity from the sky and space - Summary of responses and next steps point 3.8, last accessed: 31.07.2026: [here](#).

⁵ Ofcom (2026), Future use of 2GHz MSS - Proposals for the use of 1980 – 2010 MHz and 2170 – 2200 MHz from May 2027 point 3.21, 3.23 and 3.27, last accessed: 31.07.2026: [here](#).

⁶ Ofcom (2024), Improving mobile connectivity from the sky and space - Summary of responses and next steps point 3.8, last accessed: 31.07.2026: [here](#).

⁷ Ofcom (2026), Future use of 2GHz MSS - Proposals for the use of 1980 – 2010 MHz and 2170 – 2200 MHz from May 2027 point 3.21, 3.23 and 3.27, last accessed: 31.07.2026: [here](#).

⁸ European Commission (2025), Factual summary report of the Targeted Consultation on Mobile Satellite Services in the EU 2 GHz MSS frequency band after May 2027, last accessed: 05.08.2026: [here](#).

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	The Option B approach would facilitate creating an understanding of the spectrum environment in-band, and in adjacent bands, after WRC27. After CEPT Report 013 in 2006, no additional work on co-existence in the 2GHz MSS band in Europe has been performed. Considering the significant changes since then, including the advent of several LEO constellations, and considering the significant potential changes at the next WRC in 2027, particularly in adjacent bands under Agenda Item 1.13 and 1.12, understanding the spectrum environment both in-band, as well as in adjacent bands, is critical to ensuring efficient spectrum use. Aligning with the EU risks having to award significant portions of the spectrum to companies/interests not aligned with UK policy. The current process, following the exit of the UK from the European Union, evolves without formal UK influence. While Viasat encourages the UK to exert informal influence, a full alignment with the EU process, given its current nature, presents significant sovereignty challenges for the UK. Most notably, lot 1 and lot 2 in the EU process would be awarded, according to the proposed Regulation, only to EU companies. It may, in fact, be only one company that is awarded the full 2x20 MHz. If this was the case, and if the UK decided to align with the EU on this, 2/3 of the available spectrum could go to a company with likely very limited UK footprint, with services that are not tailored to a UK selection process, but rather the EU one and thus, with limited to no benefit for UK businesses and end-consumers and completely detached from UK policy, growth and employment objectives (as mentioned in this response document). Any bidder for lot 1 in the EU is bound to the IRIS² timeline, which is unlikely to be operational before mid-2032. Considering the strong interplay between lot 1 in the proposed Regulation and IRIS² (see Articles 7 (1) (g), 8 (1) (e) and

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	14 (1) (f)), any timeline of deployment is structurally bound to IRIS² being ready. This timeline has been subject to delays, and the last known public statements suggest it will occur at the earliest in 2032. Indeed, the European Commission provides for a 10-year ramp up time of services, meaning that with a tender in 2029, full service is not required before 2039 (see Articles 8 (1) (a) and 12 (1) (a)). If the UK was to replicate the outcome of the EU's selection process, it would be subject to the same delays in deployment of any of the selected services to the detriment of UK businesses and end-consumers. A UK process should reflect the learnings from the last MSS Framework. A UK-only award process would be subject to the same challenges as an EU one. After being chosen in an award procedure the selected applicant(s) would still need to fund, conceptualise, build and launch a pan-UK satellite capacity. Considering a potential award procedure no earlier than 2028/2029, it is entirely conceivable that selected applicant(s) would not be ready to provide pan-UK services at promised levels – for lack of sufficient satellites and the ability to provide the promised services – before 2033/2034 at the earliest. As mentioned above, the EU, in its proposed Regulation, puts the complete build out and full-service provision timeline at 10 years. Thus, any UK-only award mechanism without recognition of existing services will result in service disruptions of the EAN, prohibit Viasat from recovering its investment ultimately leading to a loss of UK value creation, further investment and job creation, cause significant technical and economic inefficiencies, and deprive the UK from the quickest route to deploy advanced MSS services. The last MSS framework in 2007-2011 has shown that the implementation of such a selection, including the conceptualising, funding, launching and commencement of such a service may take half a decade or more.

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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 As discussed above, Viasat's preferred approach would see the long-term renewal of Viasat's existing rights in the 2GHz MSS band, including continued access to 2x15 MHz (see answers to Questions 1 and 2). This approach most closely resembles Option B, as outlined in response to Question 9. The evidence demonstrates that Viasat has made substantial investments in the 2GHz MSS band and associated infrastructure and, as a result, is using 2GHz MSS band spectrum intensively to provide valuable services to UK customers, businesses and end-consumers. The evidence also shows that, if Viasat's rights were continued, there would be a likelihood of strong future demand growth and even greater benefits for UK customers, businesses and end-consumers. In this respect, it should be noted that Viasat has repeatedly demonstrated that continued access to the full 2x15 MHz assignment is necessary to support both continued EAN growth and future service development.
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 Viasat believes that Ofcom should give particular weight to ensuring the continuity of existing services to UK customers, businesses and end-consumers, protecting existing investment and reasonable investment-backed legitimate expectations, facilitating efficient spectrum use, and the benefits of leveraging such efficiencies across the region (consistent with the pan-European nature of aviation connectivity) when determining the longer-term authorisation approach for the 2GHz MSS band. The EAN was developed specifically as a regional network that would serve the UK and European nations, and airlines and passengers derive significant value from seamless connectivity across national borders, including the UK. Any discontinuity, both in terms of time- or quantity-restrictions to spectrum risks undermining these benefits while reducing overall spectrum efficiency. Ofcom should also consider the substantial existing and ongoing investments associated with the EAN made by Viasat, including investment in UK jobs across the UK and

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	the wider UK space sector, meeting the UK government's objectives. Continued operation delivers important economic benefits to UK airlines, passengers, employment and the domestic space ecosystem. Given the long asset lifetimes associated with satellite and related communications infrastructure, regulatory certainty is particularly important to support continued investment and innovation. In addition, the hybrid EAN architecture represents an efficient use of spectrum and provides a strong foundation for future development. Ofcom should take account of evolving NTN capabilities and the opportunity to build upon existing MSS infrastructure to support new classes of services. The risk of severe service disruption arising from changes to the current framework should also be carefully weighed against any potential benefits of alternative approaches.
Question 12: Do you have any comments on the Impact Assessments?	Confidential? – N Viasat broadly agrees with Ofcom's assessment that facilitating the continuation of existing uses of the 2GHz MSS spectrum would deliver important benefits, avoid unnecessary disruption, and reduce the risk of valuable spectrum lying fallow. Viasat also supports Ofcom's recognition that maintaining service continuity would minimize market uncertainty and provide significant benefits to UK customers, businesses and end-consumers, including growth and employment. However, Viasat believes that Ofcom has <i>underestimated</i> these benefits for the UK. Indeed, an appropriate assessment methodology would place greater weight on the value of preserving existing investment, maintaining incentives for continued network development, and recognising the growing utilisation of the EAN and demand for the services. Previous submissions have detailed both the scale of investment already made in the network and the benefits that it delivers to airlines and passengers. These factors should be fully reflected in the assessment of future options. The impact assessment also appears to underestimate the costs associated with service disruption, including airline retrofit and transition costs, stranded investment risks, and the undermining of the value of the existing

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	operational network. In addition, the assessment should recognise the broader costs of disrupting a functioning network at a time when demand for in-flight connectivity services continues to grow and interest in NTN-enabled services is increasing. In summary, Viasat believes that a fuller assessment of continuity, investment protection, spectrum utilisation and network development incentives would further strengthen the analysis and more accurately reflect the benefits of maintaining an established and operational MSS ecosystem.

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