

## Your response

Question	Your response
<p><b>Questions for stakeholders that are interested in using 2 GHz MSS</b></p>	
<p><b>Question 1:</b> Which service(s) do you wish to provide using 2 GHz MSS spectrum? When do you expect that you could provide these services, and what UK geography would these services cover? Where applicable, please provide evidence to support your response (including but not limited to): business plans, internal market forecasts, board papers, analyst reports, etc.</p>	<p>Confidential? – N</p> <p>Kinéis is the first 100% European-owned MSS operator with a 25-satellite constellation fully operational, a network of 20 ground stations deployed worldwide, and its operation and service center based in Europe. Kinéis provides Direct-to-Device services limited to satellite IoT and collects AIS data used by various industries, government and scientific communities. Those data are key for government and companies to better manage resources, protect the environment and improve productivity. Kinéis relies on VHF and UHF frequencies and is seeking to expand its capacity to higher ranges for its next generation network but also to expand its service offering around 2030's.</p> <p>Kinéis believes that the MSS 2GHz (30 MHz duplex) is the prime and unique candidate for IoT MSS as it accommodates enough spectrum for multiple projects (IoT, broadband D2D, etc.) while benefiting from the presence of an existing radio equipment ecosystem. This band must be made available for IoT MSS as a priority as there are currently no other similar options to satisfy guaranteed QoS for satellite services dedicated to IoT. Indeed, the bands below 3 GHz allocated to MSS are limited and already occupied by operators. Finally, UK must also recognize that this band offers the opportunity to accommodate European sovereign systems such as Kinéis.</p> <p>Kinéis has launched a constellation of 25 satellites that is fully operational since summer 2025. The operational lifetime is 8 years. Hence, Kinéis is planning to launch a new system in the 2030 horizon with two objectives.</p> <ul style="list-style-type: none"> <li>- The current fleet will be renewed to ensure continuity of service in its native band (400 MHz) that will be overpopulated by this timeline and to respond to capacity needs in higher frequency band (2GHz).</li> <li>- The second objective is to better the service offering: higher data rate, reduced latency, increased security, new downlink services and leveraging on</li> </ul>

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	<p>standardized terminal ecosystem by jumping in higher frequency bands.</p> <p>Hence up to 2032, Kinéis sees the need to allow for experimentation in the MSS 2GHz, and also to work toward a selection procedure with long-term outcomes starting in 2032.</p> <p>Kinéis focused its IoT and AIS activities on business-to-business markets across various industries (Energy, Infrastructure, Environment, Maritime, Transport and Agriculture) and communities (scientific, humanitarian, maritime/weather national and international organizations). This approach will be extended to MSS 2 GHz with improved and new IoT services. Various Kinéis enabled solution solutions are deployed to satisfy environmental monitoring applications<sup>1</sup>, early wildfire detection<sup>2</sup>, or transportation equipment monitoring<sup>3</sup>.</p>
<p><b>Question 2:</b> Please explain any barriers to your deployment of a service and your plans to address them.</p>	<p>Confidential? – N</p> <p>Regulatory certainty regarding MSS 2 GHz availability is fundamental to secure investments.</p> <p>Testing must be facilitated to secure technological development.</p>
<p><b>Question 3:</b> What benefits might be realised by enabling the service(s) you wish to provide through to 2032 (the short term)? Similarly, through to 2045 (the long term).</p>	<p>Confidential? – N</p> <p>2027-2032 period must allow technological testing</p> <p>2032-2045 period to deploy and operate the full IoT services in the MSS 2 GHz</p>
<p><b>Question 4:</b> Please explain what you consider would be the appropriate licence period for the service(s) you wish to provide? Please explain why, including providing evidence, such as asset use life, where applicable.</p>	<p>Confidential? – N</p> <p>15 to 20 years licence duration allows to secure business plans. Any less duration must be accompanied by a renewal provision securing service continuity.</p>

<sup>1</sup> <https://www.argos-system.org/>

<sup>2</sup> <https://www.kineis.com/en/dryad-networks-and-kineis-partner-for-satellite-enabled-wildfire-early-detection/>

<sup>3</sup> <https://trackvalue.fr/>

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<p><b>Question 5:</b> What is the minimum amount of spectrum you would need to provide your service(s) to deliver a basic service to customers? What additional service features and/or customer numbers could you meet with a larger allocation (please specify the amount of spectrum)? Please include details of any guard bands that you would consider necessary within this spectrum for coexistence purposes.</p>	Confidential? - Yes
<p><b>Question 6:</b> For each service, please explain why you wish to use 2 GHz MSS. Please explain why this is a more suitable frequency compared to alternatives.</p>	Confidential? - Yes

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<p><b>Question 7:</b> To what extent are there economies of scale across the UK and the EU for each service you wish to provide? What is the minimum number of users/devices you would need for each service to be economically viable?</p>	<p>Confidential? Yes</p>
<p><b>Question 8:</b> For the service(s) you wish to provide in the UK, what is the extent and nature of potential technical coexistence issues with other jurisdictions, particularly the EU? What are minimum satellite beam footprint sizes that you consider feasible, and what cross-border sharing conditions do these facilitate?</p>	<p>Confidential? Yes</p>
<p><b>Questions for stakeholders not interested in using 2 GHz MSS</b></p>	
<p><b>Question 9:</b> What service(s) do you think could use 2 GHz MSS in the UK? What benefits do you think these services could provide, and how much</p>	<p>Confidential? – Y / N n/a</p>

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spectrum do you consider these services require to (i) deliver basic services, and (ii) to deliver more advanced services?	
<b>Questions for all stakeholders</b>	
<b>Question 10:</b> Overall, to what extent does demand for 2 GHz MSS spectrum to provide services in the UK relate to demand for spectrum to provide 2 GHz MSS services in the EU (and vice versa)?	Confidential? – Y / N n/a
<b>Question 11:</b> Do you consider there would be any benefits or risks from aligning with the EU regarding the types of 2 GHz MSS services being authorised, as well as the specific operators licensed to operate?	Confidential? – Y / N n/a
<b>Question 12:</b> Do you have any other points that we should consider for our consultation on future proposals?	Confidential? – Y / N n/a