

Question	Your response
<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? - Y</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>The most significant impediment to the successful deployment of the proposed service is the prevailing lack of regulatory clarity surrounding the 2 GHz spectrum. Specifically, there is considerable uncertainty regarding its availability, the precise bandwidth that will be allocated to various services, and the specific conditions under which this allocation will occur.</p> <p>Planning and executing a satellite constellation project is an inherently complex, time-consuming, and capital-intensive undertaking. It necessitates substantial financial investments and considerable industrial commitments from all stakeholders. In the absence of any definitive guidance or clear indications from the regulatory authorities concerning their strategic intent for the spectrum currently under discussion in this consultation, it becomes exceedingly difficult, if not impossible, to make concrete decisions that would allow for the initiation of the crucial industrial and financial planning phases.</p> <p>Myriota strongly recommends that a comprehensive and clearly defined regulatory framework for spectrum utilization be established and officially communicated. This establishment should occur <i>prior</i> to any substantial industry investment in satellite constellation projects within this particular frequency band. This proactive approach would mitigate significant financial risks for</p>

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	<p>industry players and foster an environment conducive to innovation and investment in satellite-based services.</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>Myriota firmly believes that beyond the market expansion anticipated in response to question 1, a more efficient and logical utilization of the spectrum will ultimately be achieved.</p> <p>As demonstrated by the RSPG (Radio Spectrum Policy Group) research, only a minimal portion of this spectrum is currently in use. While Viasat actively operates its EAN (European Aviation Network) which is exclusively designated for aviation purposes, it is unclear whether EchoStar has been able to deploy services within this spectrum since the initial license grant and what is the regulatory status of its authorisations following the announcement of the transfer to Space X.</p> <p>Consequently, over a span of nearly two decades of exclusive spectrum assignment, only a very limited number of prototype devices have been deployed. This band has, in essence, remained largely unused.</p> <p>Should Ofcom decide to allocate this band to IoT (Internet of Things) over satellite services, it is highly probable that increased competition will foster the development of a wider array of services. This allocation would lead to a more rational and effective use of the spectrum, driven by the emergence of more affordable solutions in the market, particularly among LEO (Low Earth Orbit) operators.</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 We propose a licensing term of at least 10 years, which we believe to be the most reasonable duration. This term aligns with the inherently long cycles of investment, development, and commercial deployment characteristic of satellite network operations. It typically takes several years for an operator to successfully launch a network, establish the necessary infrastructure, and begin to realize the initial</p>

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	<p>revenue streams from their services. A term of at least 10-year provides the necessary stability and long-term planning horizon to justify the substantial upfront capital expenditure and ongoing operational costs associated with building and maintaining a robust and reliable satellite communications system. This duration also allows for the amortization of these significant investments and provides operators with sufficient time to achieve a positive return on their capital, fostering innovation and continued investment in the sector. Conversely, a 20-year term would be too long, without the inclusion of milestones to motivate the licensee to develop the system.</p>
<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>	<p>Confidential? - Y</p>
<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>	<p>Confidential? – N</p> <p>We seek to use the 1980–2010 MHz and 2170–2200 MHz MSS bands because they provide the optimal balance of propagation and device practicality for NGSO satellite services. The 2 GHz range ensures robust performance in mobile and partially obstructed environments, while avoiding the rain fade and high terminal costs associated with Ku- and Ka-band. At the same time, antennas remain compact and efficient, enabling integration into handheld, IoT, and industrial devices in a way not feasible at lower frequencies such as L-band.</p> <p>The band is also <b>standardised under 3GPP</b>, which ensures global interoperability and facilitates product conversion across multiple standardised solutions. This</p>

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	<p>provides a foundation for building a 5G NGSO network that is interoperable with US, European, and Chinese systems, while enabling enhancements that deliver long-term advantages. Myriota's approach will achieve greater spectrum efficiency (scale at lower infrastructure cost), low power consumption (longer device field life and reduced customer TCO), and enhanced privacy and security, supporting defence and tier-1 industrial requirements.</p> <p>Finally, compared to alternatives, these paired MSS allocations are uniquely suited to next-generation mobile-satellite services. L-band is congested and bandwidth-limited, while higher MSS allocations in Ku and Ka are better suited for fixed broadband rather than handheld and IoT applications. The 2 GHz MSS bands offer sufficient capacity, global harmonisation, and technical suitability, making them the most appropriate choice to support globally scalable, interoperable NGSO services.</p>
<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? - Y</p>

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<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? - Y</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 spectrum do you consider these services require to (i) deliver basic services, and (ii) to deliver more advanced services?</p>	<p>Confidential? - Y</p>
<p><b>Questions for all stakeholders</b></p>	

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<p><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)?</p>	<p>Confidential? – N</p> <p>Given the geographic proximity of the UK and the EU, Myriota is of the view that the demand for the S band allocation will be identical in the EU and the UK. As mentioned previously some form of alignment is self-imposing</p>
<p><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?</p>	<p>Confidential? –N</p> <p>Myriota is of the opinion that this alignment will be unavoidable given the geography of the European continent</p>
<p><b>Question 12:</b> Do you have any other points that we should consider for our consultation on future proposals?</p>	<p>Confidential? – N/A</p>