



**Virgin Media O2 response to Ofcom Call for Input on:**

**Future use of the 2 GHz MSS band**

**September 2025**

## INTRODUCTION

Virgin Media O2 (“VMO2”) welcomes the opportunity to respond to Ofcom’s Call for Input on Future use of the 2 GHz MSS band.<sup>1</sup>

## MAIN RESPONSE

The 2 GHz MSS band has the potential to provide benefits to UK consumers and businesses. It could be used to enable and develop Direct to Device (“D2D”) satellite services, which can supplement terrestrial mobile services by infilling not-spots, extending outdoor coverage into rural and remote areas (including very hard to reach areas beyond the scope of the Shared Rural Network), and also to provide an element of resilience by acting as an emergency backup to terrestrial mobile services.

VMO2 believes that a long-term successful outcome for the 2 GHz MSS band is more likely to be achieved if Ofcom closely follows its legal duties to promote competition and secure optimal use of spectrum. Ofcom should also pay close regard to important factors including encouraging innovation and investment, maximising spectrum efficiency and avoiding spectrum fragmentation.

To ensure a level playing field and avoid distorting competition, Ofcom should treat 2 GHz MSS licensees in a broadly similarly way to terrestrial Mobile Network Operators (“MNOs”). VMO2 observes that the position of existing 2 GHz MSS licensees differs significantly from UK MNOs who incur substantial Annual Licence Fees (“ALFs”) and increased deployment costs resulting from coverage and network resilience obligations as well as other regulatory burdens, these factors all add to the challenge MNOs face when seeking to make a return on investment.

In order to ensure optimal use of the 2 GHz MSS band, should Ofcom decide to re-allocate the spectrum without holding an auction, or decide to renew existing licences, it should consider the inclusion of use-it-or-lose-it clauses in any licences that are awarded, and in the context of a renewal, it should carry out an assessment of the use of the spectrum to date and of the spectrum needs of the services to be provided.

In the event that any 2 GHz MSS spectrum licences are not renewed, any spectrum should be made available on a neutral basis within the MSS allocation, to ensure that Ofcom does not stifle innovation in the context of rapid evolving Satellite technology. Ofcom should also seek to ensure that it does not create fragmentation of the band e.g. through awarding narrow service or technology specific licences.

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<sup>1</sup> [Call for Input - Future use of the 2 GHz MSS band](#)

Whilst seeking to promote competition, Ofcom should nevertheless be mindful of the negative consequences that can result from spectrum fragmentation. Ofcom should aim to facilitate the enablement of services that can deliver the most benefit to users. In practice, this means ensuring 2 GHz MSS spectrum assignments in sufficiently large block sizes i.e. at least 2 x 5 MHz, and preferably 2 x 10 MHz, to enable the provision of more than just access to the most basic services and applications.

Finally, Ofcom should seek to align, to the extent possible, with activities at the European level in relation to the future of the 2 GHz MSS band. Europe-wide harmonisation is important to provide the certainty required for investment and the creation of an ecosystem that will support economies of scale for equipment and services for the band, as well as helping to minimise the risk of cross-border interference. Ofcom can contribute to discussions at the European level, in groups that it is a member of, including by participating in study groups and undertaking technical analysis.