

Ofcom

innovationreview@ofcom.org.uk

Ref. Contribution to the Call for Input: Strengthening the UK's radio spectrum
regulatory framework for innovation

Dear Madam, dear Sir,

Open Cosmos Ltd. (OC) is pleased to submit this contribution to the Call for Input (CFI): Strengthening the UK's radio spectrum regulatory framework for innovation.

OC is a company founded in 2015 in the UK and headquartered in the Harwell Campus. We build, launch and operate advanced satellites through the OpenOrbit end-to-end mission management offering. Our approach has lowered mission costs, complexity and timescales, and simplified access to Earth observation data.

OC has recently announced ConnectedCosmos, a new LEO constellation that will provide sovereign and secure communications for businesses and government bodies across the globe. The new constellation combines point-to-point broadband with direct-to-device IoT, enabling users to detect threats in real time and utilise actionable intelligence to address them. It is designed to provide sovereign, high-capacity communications infrastructure, serving as a critical component of a modern digital economy and offering a secure European alternative to existing global solutions.

To facilitate the development of this and other services, we believe that commercial trial activity, including paying customers, should be permitted by Ofcom under the Demonstration and Trial licence. We also believe that trial licences should be eligible for extension until the commercial licence is issued, for a seamless transition. Our contribution focuses on these aspects (questions 1 and 2 of the CFI).

We would also like to commend Ofcom for its continued commitment to increasing the efficiency and adequacy of the regulatory framework to enable investment and development in the UK.

Yours sincerely,

James Cemmell

Vice President Institutional Partnerships

Call for Input (CFI): Strengthening the UK's radio spectrum regulatory framework for innovation

Question 1: Do you think we should permit more commercial trial activity under the Demonstration and Trial licence (including with paying customers), and whether we should impose any limitations on this?

Yes, commercial trial activity, including paying customers, should be permitted by Ofcom under the Demonstration and Trial licence.

A licence that allows the commercial offering of services being tested supports meaningful operational demonstrations and pre-commercial deployments, as well as the validation of business cases. This licence could be a pre-commercial "beta" licence. For reference, Singapore's IMDA, South Africa's ICASA, and Colombia's MinTIC already permit commercial trials, while Mexico's IFT is consulting on implementation rules.

Such a licence would enable services to be tested in more realistic operating conditions, as Ofcom highlighted, expediting the transition from laboratory testing to representative traffic and operating conditions. This would benefit investment by enabling early customer access and revenue to fund further development. Equally importantly, it would give consumers, industries and academia prompt access to novel technologies.

Also, the ability to receive payments for trials, or the commercial availability of beta services, does not increase the risk of interference, which is already considered and managed when authorising the trial under the existing framework. Therefore, accommodating a commercial offering should be a straightforward adjustment, with the applicant not claiming protection and committing not to cause harmful interference.

Question 2: Do you have any other suggestions for how the transition from trial to commercial deployment could be improved?

While we understand a trial licence does not create the right to a permanent commercial licence, we believe it should constitute strong evidence in support for a subsequent application. The assessment of such application should account for compliance with the authorised frequency, bandwidth, power, and geographic limits; measured coverage and service performance; and demonstrated coexistence with incumbent and adjacent-band users.

Particularly when the trials have been successful, and no spectrum management issues remain unresolved, we believe that the trial licence could be extended until issuance of the

commercial licence, for a seamless transition. This would ensure service continuity while providing certainty to other users, keeping operations subject to the existing technical conditions.

Extending a trial licence should not create an additional spectrum management concern because the extension would arise only after the trial had met its success criteria and demonstrated that the service was technically and operationally ready for full commercial deployment, with no unresolved coordination or harmful-interference issues.