Your response

Question	Your response
Question 1: Do you have any comments on Ofcom's proposed Work Plan for 2026/27?	Confidential? –N **Introduction** We welcome the opportunity to provide our views in response to Ofcom's consultation on the "Plan of Work 2026/27." As a satellite operator with active interest in deploying satellite IoT services in the UK, we appreciate Ofcom's forward-looking approach to spectrum policy and its continued engagement with industry stakeholders. Our response aims to provide technical and regulatory input on how spectrum policy, particularly in relation to license-exempt bands and MSS spectrum, can support resilient connectivity, efficient spectrum use, and the adoption of emerging satellite technologies across the UK. **Enabling Wireless in the UK Economy** As a satellite operator, we strongly support Ofcom's strategic priority of "Enabling Wireless in the UK Economy." We fully support and agree with the objective of ensuring that spectrum continues to meet the growing demand from an increasingly diverse range of services, thereby enabling innovation and economic growth. Flexible access to spectrum is a critical enabler for the deployment of innovative services such as D2D, as highlighted in Section 2.28. From our perspective, spectrum flexibility is essential to allow satellite-based IoT services to operate efficiently alongside existing terrestrial systems and to extend connectivity to areas where conventional networks are unavailable, impractical, or economically unviable. In particular, Section 2.28 is of significant importance from our perspective. Satellite IoT presents a substantial market opportunity for D2D services, as it can significantly enhance efficiency and effectiveness across key industries such as smart metering, maritime, agriculture, and logistics. In addition, D2D services can provide valuable and continuous coverage across the UK and surrounding maritime

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	areas, supporting critical use cases including asset tracking and maritime operations. These sectors increasingly rely on IoT applications that require ubiquitous and reliable connectivity, regardless of location. Furthermore, due to the resilience and robustness of satellite connectivity, satellite IoT can serve as a critical backup to terrestrial networks during network or power outages, not only in remote and rural areas, but also in well-connected regions. This capability enables the continuity of essential services during disasters or large-scale outages and supports the provision of vital data to disaster response and relief agencies, facilitating improved planning and more effective response. As a satellite operator, we are committed to addressing global coverage challenges and contributing to a sustainable and resilient IoT ecosystem, based on LoRaWAN and 3GPP-based technologies. We aim to provide seamless, low-power connectivity in remote and underserved areas directly aligns with Ofcom's goal to ensure that spectrum remains an effective enabler for all sectors. Plan-S specifically supports the inclusion of satellite-IoT (LPD-S) considerations under this proposal. While much of the industry focus remains on 5G/6G and high-bandwidth satellite services, there is a critical and growing demand for narrowband satellite services that support essential industrial applications. Some of the fields we are involved in are listed below: • **Energy and Infrastructure:** (i) Remote reading of electricity, natural gas, and water meters, (ii) Monitoring of power plants, solar panels, and wind turbines, (iii) Cathodic protection, energy line monitoring, and pipeline pressure/leak detection, (iv) Backup of SCADA systems and enhancement of operational efficiency, and (v) Smart lighting and manhole monitoring solutions. • **Agriculture and Environment:** (i) Smart agriculture applications: soil moisture, temperature, conductivity measurement, (ii) Drinking water quality measurement, water level and flow monitoring, (iii) Air quality measurement, meteorological stations, radiation and emission monitoring, (iv) Tracking of fishing vessels, smart beehives,

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	and wildlife, and (v) Early flood warning and environmental disaster monitoring systems. • **Logistics and Transportation:** (i) Tracking of construction machinery, tractors, trailers, and valuable assets, (ii) Monitoring of wagons, containers, cold chains, and mobile tankers, (iii) Herd tracking and waste management, and (iv) Security and emergency solutions with panic buttons. • **Supply Chain Management:** (i) Periodic location and status monitoring in global supply chains, (ii) Ensuring timely delivery of goods, and (iii) Transport capacity calculation and route optimization. • **Mining and Industrial Monitoring:** (i) Equipment and infrastructure tracking in open-pit mining sites, (ii) Monitoring underground risks, earthquakes, and landslides, (iii) Oil well pumpjack system monitoring, and (iv) Monitoring of nuclear waste and environmental safety. **In light of the benefits outlined above, we respectfully suggest that enabling satellite use in the 862–870 MHz band be considered within the scope of the "Meeting the Growing Demand of Spectrum for Space" project. The implementation of a regulatory framework for LPD-S would support the growing demand for space-related services, encourage competition, and enable the deployment of emerging technologies.** **Implementation of the ECC Decision 25 (02)** Satellite IoT operations in license-exempt bands have been validated through extensive technical studies, trials, and commercial operations. ECC Report 357 and ECC Decision (25)02 were developed for the harmonisation and regulation of satellite IoT use in the 862-870 MHz band across CEPT countries. European countries, including **Germany and Denmark**, have already begun implementing this framework, enabling satellite IoT operations in SRD bands. During the adoption of ECC Decision (25)02, the United Kingdom stated that it was unable to implement the Decision in its adopted form due to its national regulatory approach. However, the UK has expressed clear support for the deployment of Low Power Devices communicating with Satellites (LPD-S) and confirmed that it is actively

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	evaluating potential regulatory measures to enable such deployments. In this context, we align with the view that the UK's commitment to enabling satellite use of the 862–870 MHz band represents an important step towards fostering increased competition within the IoT market and enhancing the efficient use of spectrum by introducing a satellite dimension to a band that has historically been used exclusively by terrestrial applications. Furthermore, we share the position that the regulatory approach established under ECC Decision (25)02 is fully consistent with Ofcom's stated objectives. These include the ongoing evolution of the authorisation framework to address growing demand for spectrum from space-related services, the promotion of more efficient spectrum use through the coexistence of satellite and terrestrial SRD applications, and the facilitation of emerging technologies through proportionate and forward-looking regulatory measures. **In conclusion, we kindly request that Ofcom include the implementation of ECC Decision (25)02 in the UK's regulatory framework or the enablement of satellite-to-IoT communication in the 862-870 MHz band within Ofcom's proposed Plan of Work for 2026/27.** **Authorization in the 2 GHz MSS Band** Due to signal propagation characteristics, device ecosystems, and harmonization of spectrum for MSS across all three ITU regions, the industry has shown increasing interest in the 2 GHz MSS band for direct-to-device and IoT applications. The 2 GHz MSS band is critical for IoT-NTN services under 3GPP Release 17+, enabling direct-to-device connectivity with minimal bandwidth while ensuring scalable, resilient coverage across the UK and Europe, directly addressing rural and underserved region connectivity challenges. In this context, we welcome Ofcom's identification of the key projects under the priority of "Enabling wireless in the UK economy" and fully support the focus on "**Meeting the growing demand of spectrum for space**". In particular, we strongly support the continued review and evolution of the authorisation framework, including the development of a clear and flexible future approach

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	to authorisations in the 2 GHz MSS band, the review of MSS terminal authorisation, and ongoing engagement with stakeholders on strategic priorities. **Conclusion** Plan-S is committed to investing in the UK's digital ecosystem. We believe that a regulatory approach which explicitly enables satellite IoT communications under a license-exempt framework in the 862–870 MHz band, alongside shared and flexible use of spectrum in the 2 GHz MSS band, will play a pivotal role in meeting the growing demand for space-related services. Such an approach would promote competition, enhance spectrum efficiency, and facilitate the adoption of emerging satellite technologies, while ensuring coexistence with existing terrestrial services. By advancing flexible, technology-neutral, and shared-use spectrum policies, Ofcom can further strengthen the UK's position as a leader in space-enabled connectivity, innovation, and resilient digital infrastructure. We appreciate Ofcom's continued engagement with stakeholders and look forward to contributing further to the development of a regulatory framework that enables sustainable growth and maximises the socio-economic benefits of satellite services for the UK.

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