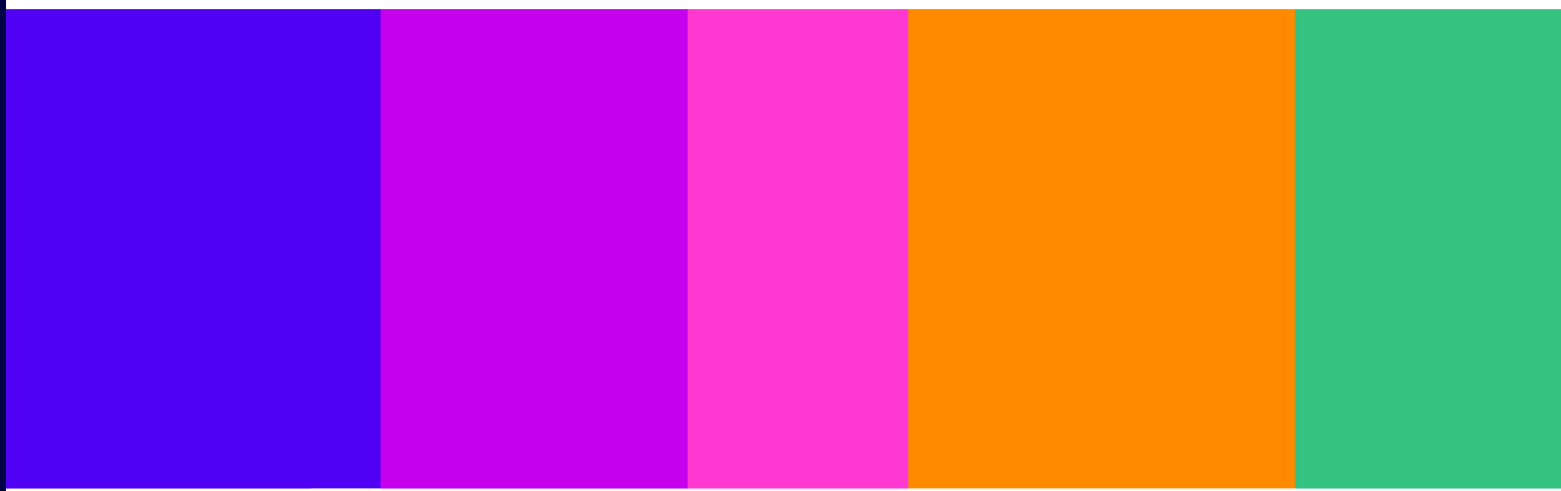


Updates to Procedures for the management of satellite filings

Statement

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Contents

Section

1. Overview.....	3
2. Introduction.....	4
3. Updates to reflect World Radiocommunication Conference decisions.....	8
4. Updates to provide additional clarity and guidance	13

Annex

A1. Impact assessments	22
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1. Overview

- 1.1 Satellite networks rely on access to finite and internationally shared resources: radio frequencies and orbital positions. These resources must be carefully coordinated to ensure that satellites can operate efficiently and without causing harmful interference. The management of satellite filings takes place within a framework of international rules set by the International Telecommunication Union (ITU), and Ofcom acts as the UK's notifying administration for organisations based in the UK, the Crown Dependencies and the Overseas Territories.
- 1.2 In March 2025 we consulted on a series of updates to our Procedures for the Management of Satellite Filings. These updates were designed to reflect changes agreed at the 2019 and 2023 World Radiocommunication Conferences (WRC-19 and WRC-23), and to provide additional clarity and transparency around aspects of our existing processes. This statement sets out the decisions we have now taken in light of stakeholder responses.

What we have decided – in brief

We are implementing updates to our Procedures to ensure continued alignment with the ITU Radio Regulations to clarify our procedures and to support the effective management of UK satellite filings. These include:

Updates required to reflect international rule changes:

- Incorporating new international requirements on NGSO systems arising from WRC-19 and WRC-23, including: i) submission of PFD/EIRP masks for EPFD examinations, ii) updated deployment milestones, iii) orbital tolerance requirements and iv) post-milestone reporting obligations.

Clarifications of our existing processes:

- Clarifying how we engage with Government in the exercise of our satellite filings role.
- Providing further detail on the process for leasing satellites for bringing into use purposes.
- Explaining how we manage applications for assignments under Regulation No. 4.4 of the Radio Regulations.
- Providing clearer guidance on applications involving UK2.1 frequencies, including how and when consultation with the Ministry of Defence may take place.

Additional guidance:

- Encouraging operators to consider recognised space sustainability guidelines

- 1.3 We have now updated the Procedures to reflect these decisions, which ensure that our Procedures remain transparent, up to date, and supportive of the UK's growing and increasingly diverse space sector, while maintaining compliance with the UK's international obligations. The updated Procedures are published alongside this statement.

2. Introduction

The satellite filings process

- 2.1 Before a satellite can use the spectrum and orbital resources it needs to fulfil its mission, it requires an associated 'satellite filing' to obtain international recognition of these resources.
- 2.2 The satellite filings process is managed under a framework of international rules operated by the International Telecommunication Union (ITU), a specialised agency of the United Nations.
- 2.3 The Radio Regulations, which are part of the treaty documents governing the ITU and its 193 member states (including the UK), contain procedures for the notification, coordination and registration of satellite filings and place certain rights and obligations onto the ITU member states. These procedures are designed to ensure that satellite networks operate without interfering with each other and also that spectrum and orbital resources are used efficiently.
- 2.4 Changes to the rules and procedures are made every four years at the World Radiocommunication Conference (WRC) held by the ITU.

Ofcom's role

- 2.5 Ofcom represents the UK in the ITU and acts as the notifying administration for the management of satellite filings for companies or other organisations registered in the UK, the British Overseas Territories, the Channel Islands and the Isle of Man.
- 2.6 The UK manages around 300 satellite filings. The majority are for GSO satellites but a growing number of filings are for NGSO systems and novel space services such as in-orbit services and lunar missions. The number of operators filing through the UK has also grown over the last 10 years, reflecting an increase in the number of UK satellite operators.
- 2.7 In undertaking its role, Ofcom reviews new submissions, ensuring their compliance with our National Procedures and the International Radio Regulations prior to their submission to the ITU, and facilitates frequency coordination with satellite networks of other administrations. The final objective of these processes is to register the satellite network with the ITU, on the Master International Frequency Register (MIFR), so that its frequency assignments obtain international recognition.
- 2.8 Throughout the lifetime of each satellite network, Ofcom will work with the satellite operator to periodically check the status of its operating frequency assignments, facilitate coordination with other satellite networks and cancel filings if they are no longer required.

The Procedures

- 2.9 In 2007 Ofcom published the Procedures for the Management of Satellite Filings, referred to hereafter in this document as the 'Procedures'. The Procedures set out how satellite operators should submit applications for satellite filings to Ofcom and the criteria and procedures that we apply for the management of satellite network filings.

- 2.10 An applicant for satellite filings under these Procedures must be a company or organisation registered, or having its headquarters, in the UK, British Overseas Territories, the Channel Islands or the Isle of Man.
- 2.11 The most recent update to the Procedures was made in 2019. This update introduced charges for our satellite filings work and did not include any international rule changes. The previous update, in March 2016, included changes to international rules that had been agreed in the previous three World Radiocommunication Conferences (in 2009, 2012 and 2015).
- 2.12 In March 2025 we consulted on updates to the Procedures to reflect changes to the international rules as agreed at WRC-19 and WRC-23, and to provide clarification and guidance on certain aspects of our satellite filings work. This statement sets out our decisions on these matters.

Legal framework

- 2.13 Ofcom’s statutory powers and duties in relation to spectrum management are set out primarily in the Communications Act 2003 (the “2003 Act”) and the Wireless Telegraphy Act 2006 (the “WT Act”).
- 2.14 Our principal duties under the 2003 Act are to further the interests of citizens and consumers in respect to communications matters, where appropriate by promoting competition. In doing so, we are also required (among other things) to secure the optimal use of spectrum and the availability throughout the United Kingdom of a wide range of electronic communications services.
- 2.15 Our spectrum management duties under the 2003 Act require us to have regard to:
- a) the desirability of promoting competition in relevant markets;
 - b) the desirability of encouraging investment and innovation in relevant markets;
 - c) the different needs and interests, so far as the use of the electro-magnetic spectrum for wireless telegraphy is concerned, of all persons who may wish to make use of it; and
 - d) the different interests of persons in the different parts of the United Kingdom, of the different ethnic communities within the United Kingdom and of persons living in rural and in urban areas.
- 2.16 Provisions of the 2003 Act relevant to Ofcom’s international functions, such as satellite filings, include the following:
- a) Section 5 of the 2003 Act gives the Secretary of State power to give directions to Ofcom for the purpose of securing compliance with international obligations, as well as for other specified purposes such as in the interests of national security.
 - b) Section 22 of the 2003 Act imposes a duty on Ofcom to do such things as it is required to do by the Secretary of State to represent the UK on international and other bodies in relation to communications matters. Section 22 also provides Ofcom with the power to represent the British Overseas Territories, the Channel Islands and the Isle of Man if requested to do so by the Secretary of State.
- 2.17 In December 2003, the Secretary of State (SoS) made directions to Ofcom under section 22 of the 2003 Act, requiring Ofcom to represent the UK Government on certain international bodies including the ITU. These directions are included in [Annex A of the](#)

[January 2004 Memorandum of Understanding \(MoU\)](#) between Ofcom and the SoS, published on our website.

- 2.18 In October 2007, the SoS and Ofcom entered into another [MoU](#) relating to Ofcom’s representation of the Channel Islands, the Isle of Man and the British Overseas Territories in the ITU.

The desirability of promoting economic growth

- 2.19 In exercising our regulatory functions, we are also required to have regard to the desirability of promoting economic growth (the “**growth duty**”).¹ In particular, we must consider the importance for the promotion of economic growth of exercising the regulatory function in a way which ensures that regulatory action is taken only when it is needed, and any action taken is proportionate. Section 110(3) of the Deregulation Act 2015 requires us to have regard to the “Growth Duty: Statutory Guidance” (revised by Government in May 2024).

International legal framework

- 2.20 The ITU is a specialised agency within the United Nations system of organisations where representatives from governments and the private sector coordinate global telecommunications networks and services. The instruments of the ITU are the Constitution, Convention and Administrative Regulations (of which the Radio Regulations are a part). Together these three instruments form an international treaty governing the use of the radio spectrum to which the signatory ITU Member States, including the UK, are bound. These instruments contain the main principles and regulations governing the following major elements:
- a) frequency allocations to different categories of radiocommunication services;
 - b) the rights and obligations of Member States in obtaining access to the spectrum/orbit resources; and,
 - c) international recognition of these rights by recording frequency assignments and, as appropriate, orbital positions used or intended to be used in the Master Register.

- 2.21 Article 6 Para 1 (CS 37) of the Constitution provides that the:

“Member States are bound to abide by the provisions of this Constitution, the Convention and the Administrative Regulations in all telecommunication offices and stations established or operated by them which engage in international services or which are capable of causing harmful interference to radio services of other countries”.

Structure of this document

- 2.22 The rest of this document is structured as follows:
- Section 3 sets out our decisions on updates to the Procedures to reflect changes to the international rules as agreed at WRC-19 and WRC-23;

¹ Section 108 of the Deregulation Act 2015, which was extended to Ofcom’s regulatory functions by The Economic Growth (Regulatory Functions) (Amendment) Order 2024.

- Section 4 sets out our decisions on updates to the Procedures to provide clarification and guidance on certain aspects of our satellite filings work. It also summarises, and responds to, additional comments provided in consultation responses.
- Our updated Procedures are published separately on our website alongside this statement and on our [main satellite filings webpage](#). We have also published a table showing the updates we have made to the Procedures from the current version (published in March 2019).

3. Updates to reflect World Radiocommunication Conference decisions

Our consultation proposals

- 3.1 In our March 2025 consultation we proposed to update the Satellite Filings Procedures to include changes to the international rules agreed in the 2019 and 2023 World Radiocommunication Conferences. The proposals included five items:
- Requirement to submit masks for EPFD examination;
 - Requirement to meet non-GSO deployment milestones;
 - Requirement to state if a satellite has deviated from the notified orbit;
 - Post-milestone reporting procedure for non-GSO systems; and
 - Requirement to state if a satellite has been used for bringing into use purposes in the last 3 years.
- 3.2 In this section we summarise responses on these items and set out our decisions on how the Procedures will be updated to reflect these international rule changes. The updated version of the Procedures is published alongside this statement.

Summary of responses

Item 1 – Requirement to submit masks for EPFD examinations

- 3.3 We proposed to update the Procedures to require applicants to prepare power-flux density (PFD) and effective isotropic radiated power (EIRP) masks for EPFD examinations and supply them along with the required information set out in ‘Table 1 – Due Diligence Requirements’ in Section 5 of our Procedures. We also proposed to require them to supply a letter of commitment indicating that they shall not operate outside of the limits specified by the mask.

Responses

- 3.4 Two respondents, Astroscale and GSOA, provided comments on this item.
- 3.5 Astroscale said that operators should be required to comply with all aspects of their filing, not just the masks, but nonetheless welcomed the inclusion of the requirement to submit masks and a letter of commitment confirming compliance.
- 3.6 GSOA made a similar point, noting its view that operators should comply with all elements of their filing, not solely the submission of masks. As such, it thought it was unnecessary for Ofcom to explicitly require compliance with the masks and suggested that the requirement to supply a letter of commitment should be dropped.

- 3.7 GSOA also asked for clarification on what type of additional information is being referred to in paragraph 2.44 of the draft Procedures. It noted that the examination under Article 22 (of the [ITU Radio Regulations](#)) is already implemented within the ITU software and suggested that requesting additional specifications regarding the NGSO system's operation may be redundant.

Our decision

- 3.8 We continue to consider that it is helpful to include a requirement to supply masks and, in cases where our analysis of filings data indicates a potential exceedance of the masks, require operators to support this with a letter of commitment. The requirement to supply masks reflects decisions taken at WRC-19 and helps to ensure UK operators seeking a satellite filing are suitably informed prior to submitting their application. To be clear, this does not negate any other obligations set out in the ITU Radio Regulations, which applicants must adhere to in order to submit a satellite filing.
- 3.9 The additional information referred to in paragraph 2.44 of the draft Procedures is described in paragraph 2.45, i.e. PFD and EIRP masks data, as per [Recommendation ITU-R S.1503](#).
- 3.10 As set out in the Recommendation, the responsibility for examination of EPFD masks is shared between the notifying administration and the ITU. To fulfil our role in this regard, we use the filing data supplied by operators to calculate a series of link budgets and check whether the filing data and PFD / EIRP masks are consistent. In some cases these calculations may show that, for certain locations and geometries, exceedances of the mask might occur. This does not mean that exceedances will happen in practice – the satellite filing simply provides a technical 'envelope' within which satellite systems need to operate. Satellite operators can adjust system parameters to ensure that their system continues to comply with the masks. However, where our calculations indicate exceedances are possible, we would ask the operator for clarification that it can and will meet the supplied masks and provide a letter setting out its commitment to do this. We consider that this requirement provides an additional layer of assurance that operators understand their obligations and will ensure that their operational system will not exceed the masks in any circumstance.
- 3.11 We have updated the text at paragraph 2.47 of the Procedures to clarify that we will only require applicants to provide a letter of commitment in cases where our analysis indicates a potential exceedance of the masks.
- 3.12 **The final text on this item is at paragraphs 2.43-2.47 (page 10) and Stage 1 in Table 1 (page 24) in the updated Procedures document.**

Item 2 - Requirement to meet non-GSO deployment milestones

- 3.13 Under the Radio Regulations, there is a requirement for satellite networks to be brought into use within seven years after the notification of the frequency assignment to the ITU-BR. At WRC-19, a decision was made to introduce four additional non-GSO deployment milestones to ensure large constellations are deployed in a timely manner and thereby ensure efficient use of spectrum. We proposed to update the Procedures to include additional non-GSO deployment requirements introduced at WRC-19.

- 3.14 We proposed edits to Section 2 of our Procedures to explain this process, and to our due diligence requirements in Section 5 to require operators to submit the relevant information to Ofcom **two months** before each of the deployment milestones are due.

Responses

- 3.15 GSOA commented that our proposed text for this item (and for item 3) primarily outlines the provisions of the ITU Radio Regulations without specifying what needs to be submitted to Ofcom. It suggested that the text for items 2 and 3 could be simplified to state: “Resolutions 35 and 8 of the ITU Radio Regulations (WRC-23) will apply to UK filings where appropriate.”
- 3.16 GSOA also thought the proposed updates to Table 1 (in Section 5) to require operators to submit milestone information to Ofcom two months in advance of ITU deadlines was excessive, and suggested that providing the data one month in advance would be sufficient for processing purposes.

Our decision

- 3.17 With regard to GSOA’s suggestion to simplify the text, we think it is useful to keep the full text that we consulted on for these items. The UK has a growing space sector: many organisations are considering launching satellite services for the first time and we hold an increasing number of satellite filings from new entrants. We do not want to presume that these parties are familiar with the ITU Radio Regulations and believe that some explanation is helpful to new entrants so they can decide which regulations apply to their mission. Our approach is in line with the UK government’s growth agenda which requires regulators to be clear and transparent about the obligations placed on UK businesses.
- 3.18 Notwithstanding this, we encourage applicants to review the ITU Radio Regulations to ensure their application for a satellite filing is compliant with the relevant international regulations for their mission.
- 3.19 We have also now included additional text in paragraph 2.57 of the Procedures to make it clearer what information needs to be submitted to Ofcom.
- 3.20 Regarding GSOA’s comments on the timelines for provision of information, we continue to consider that two months in advance of the ITU deadline for each NGSO deployment milestone is an appropriate requirement. Operators will have almost two years between milestones within which to prepare and submit the necessary information. Requiring information two months in advance helps ensure we have time to assess the information provided, request additional or corrected information where necessary, and give operators sufficient time to respond to any follow-up requests we make. This approach is intended to support operators by helping to ensure compliance with the ITU process and mitigate any risk of missing ITU deadlines.
- 3.21 **The final text on this item is at paragraphs 2.55-2.59 (pages 11-12) and Stages 5-8 in Table 1 (page 27) in the updated Procedures document.**

Item 3 – Requirement to state if a satellite has deviated from the notified orbit

- 3.22 At WRC-23, a decision was made to introduce new orbital tolerance requirements for non-GSO systems. These orbital tolerance requirements refer to the permissible variation in altitude and inclination relative to the parameters provided to the ITU.

3.23 We proposed to make edits to Section 2 of our Procedures to reflect this requirement.

Responses

3.24 As noted above, GSOA commented that our proposed text for this and the previous item primarily outlines the provisions of the ITU Radio Regulations without specifying what needs to be submitted to Ofcom. It suggested that the text for items 2 and 3 could be simplified to state: “Resolutions 35 and 8 of the ITU Radio Regulations (WRC-23) will apply to UK filings where appropriate.”

3.25 GSOA and River Advisers also noted that resolves 7 of Resolution 8 (WRC-23) is missing and should be included for completeness.

3.26 Astroscale raised concerns about how this requirement might impact In-orbit Servicing, Assembly, and Manufacturing (ISAM) activities, noting that ISAM-specific orbital behaviours are not explicitly addressed within the current ITU-R regulatory framework. It suggested that Ofcom consider including the following points in the Procedures:

- a) clarification on how Ofcom intends to treat temporary deviations from notified orbital parameters in instances where ISAM operations necessitate such flexibility;
- b) a note acknowledging that orbital behaviours associated with ISAM are not yet explicitly covered within the ITU-R framework and may be subject to further study.

Our decision

3.27 For the same reasons noted in paragraphs 3.17-3.19 above, we think it is useful to keep the full text that we consulted on for items 2 and 3. Notwithstanding this, we encourage applicants to review the ITU Radio Regulations to ensure their application for a satellite filing is compliant with the relevant international regulations for their mission.

3.28 We have now updated the text in paragraph 2.62 of our Procedures to make it clearer what information needs to be submitted to Ofcom. We have also updated paragraph 2.61 in our Procedures to include resolves 7 of Resolution 8 (WRC-23).

3.29 In relation to ISAM activities and other novel missions, we recognise that there is a growing diversity in UK-based space activities and innovation. We encourage UK operators to engage with us early to discuss their missions, so we can discuss the regulations that might apply to their specific circumstances. We regularly review the Procedures and will consider whether it would be beneficial to include additional text on processes for innovative missions in due course, for example to reflect any international agreements. We have included a new footnote on paragraph 2.60 of the Procedures to deal with the concern raised by Astroscale.

3.30 **The final text on this item is at paragraphs 2.60-2.63 (pages 12-13) in the updated Procedures document.**

Item 4 – Post-milestone reporting procedure for non-GSO systems

3.31 After the milestone process described under item 2 has been completed, Ofcom must continue to communicate non-GSO system deployment information to the ITU every four

years. If the number of satellites considered as part of the non-GSO system falls below the total number of satellites indicated², additional reporting requirements apply.

- 3.32 We proposed edits to Section 2 of our Procedures to explain this process, and proposed to update our due diligence requirements in Section 5 of our Procedures to require operators to submit the relevant information to Ofcom no later than the end of each four-year period.

Responses

- 3.33 No respondents commented on this proposed change.

Our decision

- 3.34 We have decided to proceed with making the edits proposed in our consultation.
- 3.35 **The final text on this item is at paragraphs 2.64-2.67 (pages 13-14) and Stage 9 in Table 1 (page 28) in the updated Procedures document.**

Item 5 – Requirement to state if satellite has been used for bringing into use purposes in last 3 years

- 3.36 We proposed to make edits to Sections 2 and 5 of our Procedures to clarify that this existing requirement in our Procedures is based on Resolution 40 in the Radio Regulations.

Responses

- 3.37 No respondents commented on this proposed change.

Our decision

- 3.38 We have decided to proceed with making the edits proposed in our consultation.
- 3.39 **The final text on this item is at footnote 6 (paragraph 2.85) and Stage 3 in Table 1 (page 27) in the updated Procedures document.**

² In the Master Register in Part II-S of the BR IFIC, if available, or in the latest notification information published in the BR IFIC (Part I-S) for the frequency assignments.

4. Updates to provide additional clarity and guidance

Introduction

- 4.1 In our March 2025 consultation, in addition to updates to reflect international rule changes, we also proposed to make updates to provide additional clarity or guidance on our existing processes. To be clear, these changes reflect what we already do, and do not represent changes to our approach.
- 4.2 The key areas we identified were:
- clarifications relating to our role in managing satellite filings;
 - clarifications on leasing of satellites for bringing into use purposes;
 - clarifications around how we manage applications under No. 4.4 of the Radio Regulations; and
 - clarifications in relation to applications for UK2.1 frequencies.
- 4.3 We also proposed to provide some additional guidance relating to space sustainability.
- 4.4 Finally, we noted that we would make some minor editorial changes to our Procedures including, for example:
- to reflect changes in the space environment since we last updated our Procedures; and
 - to reflect changes of responsibilities, e.g. the Civil Aviation Authority (CAA) has taken over satellite licensing responsibilities from the UK Space Agency (UKSA).
- 4.5 In this section we summarise responses to these proposals and set out our decisions.

Summary of responses and our decisions

Our role in managing satellite filings

- 4.6 We proposed to update section 3 of our Procedures to include additional text which explains how we engage with Government in relation to our work on satellite filings.
- 4.7 We explained that we discuss issues with relevant Government departments and agencies as needed. We may do this at any stage of the satellite filings process and throughout the lifetime of the filing in relation to any decision which may affect the national security or interests of the UK, as determined by the UK Government. In line with section 22 of the 2003 Act, the Secretary of State may require Ofcom to act in accordance with any guidance it provides. We noted that the changes to the text do not reflect a new approach to our interactions with Government but, rather, seek to provide additional transparency and clarity on our existing approach.

Responses

- 4.8 Two respondents, Astroscale and GSOA, commented on this proposed update.

- 4.9 Astroscale supported the principle of our proposed updates but believed that additional clarity around this process would help “ensure it remains proportionate, transparent, and predictable for commercial operators”. It said it would welcome further detail on the practical implications this may have for applicants, including whether such consultations could result in delays, requests for modifications, or potential cancellation of filings. It also queried whether operators should expect any specific obligations or constraints as a result of this process.
- 4.10 Both Astroscale and GSOA requested that operators be informed of the reasons for sharing of information with UK Government departments or agencies; Astroscale suggested that a provision should be included in the updated Procedures to this effect.

Our decision

- 4.11 As explained in our consultation, we are not introducing a new approach or process for consulting with Government. Rather, we are providing additional transparency and guidance on how we fulfil our role representing the UK Government in managing satellite filings, as directed by the Secretary of State (SoS)³. As such, applicants should not see any difference in process or timing arising as a result of including this text in the Procedures. Moreover, the majority of filing applications do not raise any concerns in relation to the national security or interests of the UK and therefore would not experience any impacts or delays.
- 4.12 In the event that a concern were raised that led to a request for modification to the application, we would discuss this with the applicant. If the concern were substantive enough to lead to the Secretary of State giving specific directions to Ofcom under the process set out in section 22 of the 2003 Act, this could lead to the affected filing application not being submitted to the ITU, or to the filing being cancelled. However, we would note that this eventuality has not occurred to date for any filing application made to Ofcom.
- 4.13 The reason for discussing a filing application with the UK Government would generally be where we or Government have concerns that the filing may affect the national security or interests of the UK. At a minimum, we would expect to provide updates to operators if this process is likely to result in delays to submission of filings. We will also consider whether reasons for sharing of information could be shared with operators on a case by case basis. As with all filing applications, we encourage operators to engage with us early to reduce the likelihood of delays to the submission or notification of filings.
- 4.14 After careful consideration we have decided not to further amend the text that we included in paragraph 3.4 of the draft Procedures on this point, as, having considered the issues raised, we believe the text as it stands gives sufficient clarity for stakeholders and flexibility for Ofcom.
- 4.15 **The final text on this subject is at paragraph 3.4 of the updated Procedures document.**

Leasing of satellites for bringing into use purposes

³ See [Annex A of the January 2004 Memorandum of Understanding \(MoU\) between Ofcom and the SoS](#), published on our website

- 4.16 We proposed to update Section 2 of the Procedures to include additional text setting out the process for leasing satellites under the responsibility of other administrations to bring filings into use.
- 4.17 We explained that, in the case where we become aware of a request from another administration to lease a UK-licensed satellite to bring into use a filing, we would discuss this request with the CAA (as the UK's satellite licensing authority, it would need to authorise the drift of a UK satellite) and other relevant Government departments as appropriate.

Responses

- 4.18 Astroscale and River Advisers welcomed the new guidance while also suggesting that additional guidance would be helpful.
- 4.19 Astroscale noted that the new proposed text would be particularly helpful for operators who may not be fully aware of these obligations while also proposing that we include some additional points:
- a) the Procedures should comprehensively cover both the transfer of ownership and the leasing of satellites for bringing into use purposes, as these are both covered by the WRC-12 decision;
 - b) the Procedures should provide greater clarity regarding the role of CAA with regard to the leasing or transfer of ownership of UK-licensed satellites;
 - c) the Procedures could outline instances where Ofcom's approvals or notifications are subject to further authorisation from the CAA when appropriate, and Ofcom and CAA's guidance should be well-aligned;
 - d) Ofcom should provide clarifications on the process outlined in para 2.86 of the Procedures, including the scope and nature of discussions, regulatory accountability and liability and the consideration of strategic use of UK satellites.
- 4.20 River Advisers agreed with the proposed updated text but suggested also including details (such as timelines) of the opposite scenario, in which a UK operator seeks to use a satellite licensed by another administration to bring into use UK frequency assignments.

Our decision

- 4.21 Both Ofcom and the CAA have responsibilities in relation to the leasing of satellites for bringing into use purposes: Ofcom acts as the UK notifying administration for satellite filings and is responsible for the management of civil spectrum within the UK. We also liaise with other administrations around the world on spectrum matters. The CAA is responsible for satellite licensing and all matters relating to the safe operation of UK satellites in space, including authorising the drift of a satellite.
- 4.22 Requests from another administration to lease a UK-licensed satellite may be received by either the CAA or Ofcom. In either case, the CAA and Ofcom would notify each other of the request. As explained above under the previous subheading, where we consider that the lease request could potentially have an impact on the national security or interest of the UK, we may also discuss the request with other government departments as appropriate.
- 4.23 We have included a new footnote in paragraph 2.87 of our updated Procedures (originally paragraph 2.86 in the draft Procedures) to explain CAA's role. We consider that this revised text now provides a proportionate, clear and comprehensive explanation of how

Ofcom manages satellite leasing requests. We encourage operators to engage with us early if they require further guidance or clarification around potential leasing requests.

- 4.24 In relation to transfer of ownership, section 11 of our Procedures sets out the process for transferring ownership and control of a filing from one UK operator to another UK operator. However, the transfer of *satellite* ownership in the UK is a matter for the UK Space Agency and not Ofcom and therefore we have not included this point in our Procedures.
- 4.25 We agree with River Advisers' suggestion to include details of our approach to the scenario in which a UK operator seeks to use a satellite licensed by another administration to bring into use UK frequency assignments, and have included a new paragraph 2.88 to cover this point.
- 4.26 The final text on this subject is at paragraphs 2.86-2.88 of the updated Procedures document.**

Space sustainability

- 4.27 In our consultation, we highlighted the UK Government's 2024 Space Regulatory Review, and noted that it identified 'Safety and Sustainability' as one its 7 priority regulatory outcomes for the UK space environment.
- 4.28 In view of this, we considered whether to make any updates to our Procedures in relation to space sustainability. Given our remit, and that of the CAA, we did not consider it appropriate or necessary for us to impose additional sustainability requirements on operators as part of our satellite filings procedures.
- 4.29 Rather, we proposed to include text in Section 4 of our Procedures encouraging operators to adhere to relevant guidelines on space sustainability, including the [IADC Space Debris Guidelines](#).

Responses

- 4.30 GSOA and River Advisers both supported our proposed updated text.
- 4.31 Astroscale welcomed the addition of this guidance while noting that operators using UK registered satellite filings but not licensed by the CAA "may or may not be subject to equivalent obligations under UK law". It suggested some additions to the Procedures 'to encourage greater transparency and consistency', for example through an optional sustainability declaration, discretionary submission of a mitigation plan and/or a voluntary checklist or statement outlining an applicants' consideration of relevant sustainability guidelines.

Our decision

- 4.32 We note Astroscale's suggested additions to the Procedures and agree that greater consistency in the application of space sustainability policies is desirable. However, space sustainability policies primarily relate to the operation of satellites, which is outside of our remit. While we recognise that Astroscale's suggested additions to our procedures would be non-mandatory, we think that managing this process in a meaningful way (which might include e.g. seeking expert input from CAA to review such submissions) could introduce additional burdens for UK satellite operators, duplication with CAA processes for UK-licensed satellites and delays to the review and submission of filings through the UK. On

balance we consider that our proposed approach of encouraging compliance and highlighting the relevant international guidelines fits best with our current remit.

- 4.33 Following the publication of the UK Government’s Space Regulatory Review in 2024, work is ongoing on the development of a UK space sustainability policy. This policy will predominantly apply to the licensing of satellites and how they operate, and is led by Government departments and agencies, including the UK Space Agency and CAA. Ofcom is engaged in this work and, once this is further progressed, will consider whether to make any further adjustments to our satellite filings procedures.
- 4.34 We have therefore decided to proceed with the proposed text set out in our consultation.
- 4.35 **The final text on this subject is at paragraphs 4.12-4.13 of the updated Procedures document.**

Radio Regulation No. 4.4

- 4.36 We proposed to update our Procedures to include information on how we deal with applications for assignments under Regulation No. 4.4, including setting out the factors that we take account of in our decisions, i.e.:
- a) whether the requested frequencies are under consideration to be included in the Radio Regulations in a future World Radiocommunication Conference;
 - b) whether there is evidence that the application could promote economic growth and enable early realisation of citizen and consumer benefits from new services or technologies; and
 - c) whether there is reason to be confident that the proposed use would not result in harmful interference to other authorised spectrum users.
- 4.37 We also proposed to add new text to explain what applicants need to do to assure us that their proposed use would not result in harmful interference to other authorised spectrum users.

Responses

- 4.38 Astroscale and River Advisers both supported the approach set out in our proposed text. Astroscale commented that “this balanced approach enables innovation while maintaining the spectrum environment”.
- 4.39 The RSGB were pleased to see Ofcom include this point in the Procedures but made some comments on our proposed text as follows:
- In relation to paragraph 6.24(b) in the draft updated Procedures, it thought that use of 4.4 for economic growth (etc) should be more tightly bounded and not used as an easy override of due process and existing allocations.
 - In relation to paragraph 6.24(b), it said that the inappropriate use of 4.4 is a concern and that it had seen this inaccurately referred to as the ‘experimental satellite service’.
- 4.40 The RSGB also suggested that the text could more explicitly state that 4.4 usage is not under any ITU service, as well as being on a non-protected, non-interference basis.

Our decision

- 4.41 We note and acknowledge the concerns raised by the RSGB about the use of Regulation No. 4.4. On the specific wording of paragraph 6.24, we note that we would consider all of the three factors listed here when deciding whether to authorise an application for a

frequency assignment under Regulation No. 4.4. As such, we consider that the economic growth consideration is already appropriately bounded by, for example, the requirement for us to be confident that the proposed use would not result in harmful interference to other authorised spectrum users.

- 4.42 We would also highlight that our proposed text in section 2 of the updated Procedures quotes directly from the ITU Radio Regulations, including noting that use under 4.4 is on a non-interference, non-protection basis. We are therefore satisfied that the proposed wording accurately conveys the key points in relation to how such assignments are to be managed.
- 4.43 We cover the RSGB's wider concerns about the amateur satellite service below under the additional comments subheading.
- 4.44 **The final text on this subject is at paragraphs 2.16-2.18 and 6.23-6.27 of the updated Procedures document.**

Applications for UK2.1 frequencies

- 4.45 We proposed to include text in Section 4 of our Procedures to explain how we deal with applications for filings in UK2.1 frequencies.
- 4.46 When we receive applications for satellite filings which include UK2.1 frequencies, we will seek comments from the Ministry of Defence (MOD). Consultation with MOD will occur prior to the initial submission and again prior to the notification of a satellite filing being made to the ITU-BR. MOD may require the operator to enter into a contract with it, setting out conditions for holding a filing for UK2.1 spectrum.

Responses

- 4.47 Two respondents, Astroscale and River Advisers, welcomed this clarification, while also offering suggestions on additional guidance that could be provided. A confidential respondent on the other hand argued strongly against this proposed update.
- 4.48 Astroscale was concerned that the two-stage consultation process, before initial submission to the ITU and final notification, could create uncertainty for applicants. It suggested that we could: i) consider providing indicative timelines or broad criteria for MOD objections; and ii) explore the possibility of a form of conditional approval for provisional feedback following the initial MOD consultation.
- 4.49 River Advisers thought that it would be helpful if Ofcom could also provide guidance on the expected processing times for such requests (as provided for Advance Publication Information and Request for Coordination applications in paragraphs 7.6 and 7.7, respectively).
- 4.50 The confidential respondent strongly opposed the inclusion of this text. It said that this would give MOD effective veto power over satellite operator applications for global filings in the 30–31 GHz Ka-Band ("Mil-Ka") and considered that this approach lacks legal foundation and undermines the principles of international coordination. It thought that this would likely drive operators to seek filings through foreign administrations, where MOD and Ofcom hold no influence and that this would reduce the UK's role in global spectrum coordination.

- 4.51 It further raised a number of concerns reflecting their view of the proposals as non-transparent, unaccountable, disproportionate, inconsistent, unnecessary and unrepresentative of best regulatory practice. For example, it thought that:
- the proposals were non-transparent because they “effectively represent a surrender of Ofcom’s duty under Section 22 of the Communications Act to be the sole representative of His Majesty’s Government at the ITU (including in the administration of satellite filings) and would introduce a wholly new requirement on satellite operators”. It said that this is a substantive change, and presenting it as a clarification is not sufficiently transparent.
 - Further, they considered the proposal to be inconsistent with Ofcom’s general policy to provide access to spectrum to enable growth in the benefits that the space sector delivers for people, businesses and the public sector in the UK. In addition, they considered it to be best regulatory practice to only impose new regulatory barriers on new entrants; therefore they felt that Ofcom should clarify that 4.11 of the draft Procedures shall not be applied retroactively.

Our decision

- 4.52 We note the suggestions and feedback provided by respondents. As explained in our consultation, we were not consulting on whether to introduce a new process. Our proposals were to provide additional clarity on our existing process, and this process has been in place for many years. As such, it does not impose new regulatory barriers on either new entrants or existing operators.
- 4.53 As set out at paragraphs 2.18-2.19 and 4.5 of our consultation, pursuant to a direction from the Secretary of State under section 22 of the 2003 Communications Act, Ofcom represents the UK Government in the ITU and acts as the UK’s notifying administration for satellite filings. We have explained above (in paragraphs 4.6-4.14) that, in carrying out our role, we discuss with Government any issues which may affect the national security or interests of the UK. We think that it is appropriate and reasonable to support a process which allows the UK Government to protect legitimate national interests, and consider that this process is fully consistent with our role in relation to satellite filings.
- 4.54 We do not agree that this process is inconsistent with Ofcom’s general policy to provide access to spectrum to enable growth in the benefits that the space sector delivers for the UK. Our experience is that most filings applicants who have applied for UK2.1 frequencies have been content to enter into a contract with MOD (where this has been deemed necessary) and this has not blocked access to spectrum.
- 4.55 Notwithstanding the above, we are considering with Government potential alternative approaches for protecting national interests in UK2.1 frequencies. However, until a different approach is agreed, we consider that it is appropriate and transparent to include text reflecting the current process in the Procedures.
- 4.56 We encourage all satellite operators seeking to use UK2.1 frequencies to engage with us early so that any additional checks – and any discussions with MOD – do not cause delays to project timelines.
- 4.57 In view of the responses received, we have made some minor edits to the draft text we consulted on to better reflect Ofcom’s role in this process, and to encourage satellite operators to engage with us early when seeking use of UK2.1 frequencies.

4.58 **The final text on this subject is at paragraphs 4.9-4.11 of the updated Procedures document.**

Additional comments

4.59 In addition to the specific areas discussed above, we also asked whether respondents had any additional comments on other areas of our Procedures which they thought would benefit from additional clarity or to correct factual errors or omissions.

Responses

4.60 We received several comments as follows:

- Astroscale thought that the Procedures could benefit from greater clarity on the process for submitting responses to BR IFIC Special Sections, including by highlighting the use of the BR IFIC Commenting System under “Special Section Publications” to clearly identify the platform as the primary tool for submitting responses. Astroscale also requested we include links to relevant Ofcom websites, ITU Software tools and Government/CAA websites.
- River Advisers suggested that the text at paragraph 5.5 be edited to clarify the requirements for Advance Publication Information (API) submissions as compared to Request for Coordination submissions, because the deliverables described under Stage 2 may be accomplished on significantly shorter timescales than accounted for in Table 1 for API submissions. It said that this clarification would also be useful in the context of paragraph 2.50, noting that its experience has been that Ofcom would prefer the notification procedure to be initiated after a satellite has been launched and its final orbital parameters confirmed. It thought confirmation of this aspect would be helpful for operators to anticipate Ofcom’s cost recovery charges for satellite filing work.
- RSGB expressed concerns regarding requests to use the amateur satellite service, particularly where transmissions from a (typically non-amateur) request/satellite has the potential to cause interference to amateur terrestrial usage, such as the weak signal sub-bands or repeater inputs. It said it would appreciate Ofcom including a reference to the ITU-recognised IARU Satellite Panel and ITU Small Satellite advice for applications that may utilise amateur satellite service allocations, noting this may particularly assist educational and scientific institutions who are less familiar with formal satellite filing procedures.

Our decisions

4.61 Our response to the additional comments is as follows:

- In response to Astroscale’s comments, we have included a new paragraph (7.33) in our Procedures with a link to Ofcom’s BR IFIC Commenting System, explaining that this can be used to submit responses. We have also reviewed links in our Procedures and added new links in a number of places to help readers easily find relevant information.
- Regarding River Advisers’ request to clarify requirements for API submissions, we recognise that project timelines can vary. Section 5 is designed to provide an overview of the information applicants should submit and when, but does not seek to describe the varying timescales for different project types. We additionally note that Table 1 specifies different deadlines for API submissions and request for coordination submissions. We are satisfied that the information in Section 5 accurately reflects the current process and deadlines for both API and request for coordination submissions. In

all cases, we encourage operators to engage with us early so we can identify any challenges in meeting specific deliverables and determine where flexibility may be needed.

- In relation to River Advisers' comment on paragraph 2.50 in the Procedures, we have added additional text to this paragraph to clarify that, for assignments which do not require coordination under Section II of Article 9, the notification procedure for space stations can generally be initiated upon the completion of the API procedure *and once a spacecraft has been launched*.
- On RSGB's request to include additional references in our Procedures, we have inserted a new footnote at paragraph 4.5 in our Procedures to include a reference to the [ITU Small Satellites](#) advice and information from the [IARU](#) on satellite frequency coordination.

A1. Impact assessments

Impact assessment

- A1.1 Section 7 of the Communications Act 2003 (the Act) requires us to carry out and publish an assessment of the likely impact of implementing a proposal which would be likely to have a significant impact on businesses or the general public, or when there is a major change in Ofcom's activities.
- A1.2 Impact assessments form part of good policymaking and we therefore expect to carry them out in relation to a large majority of our proposals. We use impact assessments to help us understand and assess the potential impact of our policy decisions before we make them. They also help us explain the policy decisions we have decided to take and why we consider those decisions best fulfil our applicable duties and objectives in the least intrusive way. Our [impact assessment guidance](#) sets out our general approach to how we assess and present the impact of our proposed decisions.
- A1.3 The proposals we set out in our March 2025 consultation related to updating text in our Procedures for the management of satellite filings. We proposed to:
- a) bring the Procedures into line with changes made to the Radio Regulations at the last two World Radiocommunication Conferences, WRC-19 and WRC-23.
 - b) include text to provide additional clarity or guidance on certain aspects of our satellite filings work, and to make general editorial updates to the text.
- A1.4 In relation to changes to reflect decisions made at WRC-19 and WRC-23 (as discussed in Section 3 of this statement), Ofcom is required under the existing legal framework to ensure that use of the radio spectrum in the UK complies with the provisions of the Radio Regulations. As such, we did not assess the impact of requiring compliance with updated provisions in the Radio Regulations, as we are already required by the legal framework to do this. Rather, we assessed the impact of the way that we proposed to implement these provisions in the Procedures. We have now decided to directly reflect the updated provisions in the Radio Regulations in the Procedures, while making a number of minor textual edits to our Procedures to reflect comments from stakeholders. Further details on our decisions are provided in Section 3 of this statement.
- A1.5 In the case of new non-GSO deployment milestones, we have now decided to require operators to provide information to us two months in advance of the deadlines set out in the Radio Regulations. We continue to consider that this timeline is broadly consistent with other similar timelines in our Procedures and should not result in any negative impacts on satellite operators. A two month deadline provides Ofcom with sufficient time to carry out checks for submitting information to the ITU and time for operators to respond to any follow-up requests we make. This approach supports operators by helping to ensure compliance with the ITU process and mitigate any risk of missing ITU deadlines.
- A1.6 In relation to updates to provide additional clarity or guidance (as discussed in Section 4 of this statement), we note that these updates do not reflect changes to our approach but rather are designed to provide additional clarity to filing applicants on how we undertake certain aspects of our satellite filings work. We continue to consider that overall these proposed updates should only have positive impacts on applicants for satellite filings by

providing more clarity, including some additions requested by respondents. Further details on our decisions are provided in Section 4 of this statement.

Equality impact assessment

- A1.7 We have given careful consideration to whether our decisions will have a particular impact on persons sharing protected characteristics (broadly including race, age, disability, sex, sexual orientation, gender reassignment, pregnancy and maternity, marriage and civil partnership and religion or belief in the UK and also dependents and political opinion in Northern Ireland), and in particular whether they may discriminate against such persons or impact on equality of opportunity or good relations. This assessment helps us comply with our duties under the Equality Act 2010 and the Northern Ireland Act 1998.
- A1.8 In our consultation we explained that, due to the nature of our proposals, we did not consider that they would affect any specific groups of persons (including persons that share protected characteristics under the 2010 Act or the 1998 Act) differently to the general population. We did not receive any responses on this point and our assessment has not changed from that set out in the consultation.

Welsh language

- A1.9 Ofcom is required to take Welsh language considerations into account when formulating, reviewing, or revising policies which are relevant to Wales (including proposals which are not targeted at Wales specifically but are of interest across the UK).
- A1.10 In our consultation we set out our view that our proposals would not have any impact on opportunities for persons to use the Welsh language or treating the Welsh language no less favourably than the English language. We did not receive any responses on this point and our assessment has not changed from that set out in the consultation.