

Your response

Question	Your response
<p>Question 1: Do you agree with the proposed updated text in relation to WRC decisions? If not, please specify which item you disagree with and provide reasons for your response.</p>	<p>Confidential? – N</p> <p>Updates to reflect World Radiocommunication Conference decisions</p> <p>Astroscale welcomes Ofcom’s proposed updates to its filing procedures, which effectively incorporate key decisions from the WRC-19 and WRC-23. We believe that these updates enhance transparency, regulatory clarity, and alignment with international standards, and consider the revised Procedures to be a valuable reference and guidance document, outlining Ofcom’s main functions and obligations, while also providing satellite operators, particularly new entrants, with a clear guidance on the basic requirements and general steps necessary to access the radiofrequency spectrum in the United Kingdom.</p> <p>We also support the structured timelines for data submission, which will assist Ofcom in fulfilling its obligations to the ITU Radiocommunication Bureau (ITU BR) in a timely and accurate manner. For satellite operators, this predictability reduces the risks of regulatory delays and provides a clear and consistent framework that support operational efficiency.</p> <p>In addition, we offer the following comments on specific procedural updates included in the revised document:</p> <p><u>Requirement to submit EPFD Masks</u></p> <p>Astroscale believes that operators should be required to comply with all aspects of their filing, not just the EPFD masks. Nonetheless, we welcome the inclusion of the requirement to submit EPFD masks and a letter of commitment confirming compliance with EPFD limits in accordance with Article 22 of the ITU Radio Regulations. This measure promotes effective frequency sharing while protecting GSO networks, reflecting Ofcom’s commitment to spectrum efficiency and sustainable satellite operations.</p>

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	<p data-bbox="699 322 1374 387"><u>Requirement to state if a satellite has deviated from the notified orbit</u></p> <p data-bbox="699 416 1374 719">We appreciate the added clarity in the Procedures concerning orbital tolerances for non-GSO systems notified under Resolution 35 and 8 of the Radio Regulations. These provisions support the regulatory consistency and milestone validation. Regarding items 2.59 to 2.62, and to ensure the information is complete, Resolves 7 of Resolution 8 (WRC-23) should also be incorporated into the Procedures.</p> <p data-bbox="699 748 1374 931">However, we wish to raise concerns regarding the potential implications of these provisions for In-orbit Servicing, Assembly, and Manufacturing (ISAM) activities. These missions, which include in-orbit servicing, orbital debris removal, and inspection, often involve:</p> <ul data-bbox="746 960 1374 1263" style="list-style-type: none"> <li data-bbox="746 960 1374 1104">• Dynamic manoeuvring, orbital transfer, and rendezvous operations with space objects, which may not typically associated with conventional FSS, BSS and MSS satellite operations; <li data-bbox="746 1120 1374 1187">• Proximity operations that differ from nominal orbital operations; and <li data-bbox="746 1202 1374 1263">• Temporary repositioning to enable servicing, inspection, or disposal. <p data-bbox="699 1308 1374 1491">Given these characteristics, strict enforcement of the orbital deviation provisions as outlined in paragraph 2.59-2.62 of the Procedures, could inadvertently constrain ISAM activities, particularly where such manoeuvres are mission-critical.</p> <p data-bbox="699 1536 1374 1760">At present, ISAM-specific orbital behaviours are not explicitly addressed within the current ITU-R regulatory framework, including Resolution 8 and 35. This creates some regulatory uncertainty regarding how such missions are treated in relation to orbital tolerance obligations.</p> <p data-bbox="699 1792 1374 1935">To prevent the unintended exclusion or penalisation of ISAM operations and to support the UK's objectives on space sustainability and innovation, we respectfully suggest that Ofcom consider including the following:</p>

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	<p>a) Clarifying how it intends to treat temporary deviations from notified orbital parameters in instances where ISAM operations necessitate such flexibility. While we understand the need to remain aligned with the Radio Regulations, a brief explanation within the Procedures outlining Ofcom’s approach to assessing such deviations would offer predictability for operators engaged in ISAM missions, including both the servicer and client space objects, without creating any new precedent or regulatory obligations; and</p> <p>b) Including a note in the Procedures acknowledging that orbital behaviours associated with ISAM are not yet explicitly covered within the ITU-R framework and may be subject to further study. Such clarification would demonstrate the UK’s forward-looking stance and constructive engagement in developing a satellite regulatory framework without imposing any additional requirements beyond those currently in force.</p>
<p>Question 2: Do you agree with the proposed updated text in relation to a) clarifications to our role and satellite leasing, b) space sustainability, c) No. 4.4 of the Radio Regulations and d) applications for UK2.1 frequencies? If not, please specify which part you disagree with and provide reasons for your response.</p>	<p>Confidential? – N</p> <p><u>Ofcom role in managing satellite filings</u></p> <p>Astroscale supports the principle that Ofcom may share satellite filing information with relevant UK Government departments and agencies, particularly where national security or broader UK interests are concerned. Coordination between HMG stakeholders and regulators is essential to ensuring responsible spectrum use. However, we believe that additional clarity around this process would help ensure it remains proportionate, transparent, and predictable for commercial operators.</p> <p>Specifically, while we understand that engagement with government stakeholders may occur at any stage of the filing process or throughout its lifetime, we would welcome further detail on the practical implications this may have for applicants. For instance, it remains unclear whether such consultations could result in delays, requests for modifications, or potential cancellation of filings, either post-submissions or post-launch. From an</p>

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	<p>operator’s perspective, understanding the scope and potential outcomes of this process is critical for informed planning and investment decisions.</p> <p>We would also welcome clarification on whether operators should expect any specific obligations or constraints, beyond confidentiality, as a result of this information-sharing process. Finally, Astroscale respectfully suggests that the updated Procedures include a provision whereby operators are informed of the reasons when data is shared by Ofcom with UK Government departments or agencies.</p> <p><u>Leasing of satellites for bringing into use purposes</u></p> <p>We appreciate the new guidance on satellite leasing procedures, which references the WRC-12 decision on notification requirements between administrations. This information is particularly helpful for operators who may not be fully aware of these obligations, as it supports a more streamlined process and reduces the risk of regulatory oversight.</p> <p>We would like to highlight that the WRC-12 decision on notification requirements between administrations includes both the transfer of ownership and the leasing of satellites for bringing into use purposes. Astroscale believes that the Procedures should comprehensively cover these decisions. In addition, while the Procedures rightly focus on Ofcom’s role as the UK administration (in notifying and responding when notified by a foreign administration), we believe they should also include more comprehensive guidance on the back-to-back licensing steps. This should include greater clarity regarding the role of the CAA when it comes to the leasing or transfer of ownership of UK-licensed satellites (space activities licensed by the CAA under the OSA 1986 or SIA 2018).</p> <p>Furthermore, it would be beneficial if the Procedures could outline instances where Ofcom’s approvals or notifications are subject to further authorisation from the CAA when appropriate. As the UK has a dual licensing framework, it would be highly beneficial for the guidance documents and procedures set out by the two independent regulators, namely Ofcom and the CAA, to be well coordinated and aligned. This would provide licensees</p>

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	<p>with a clear, transparent, and coherent framework to ensure they can carry out their activities, given the complexities involved.</p> <p>Considering this, we would welcome further clarification on the process outlined in the proposed paragraph 2.86 of the Procedures, which indicates that when Ofcom becomes aware of a request from another administration to use a UK-licensed satellite to bring into use or continue the use of a frequency assignment, it will consult with the Civil Aviation Authority (CAA) and other relevant Government departments as necessary. To assist satellite operators in gaining a clearer understanding of this process and its implications, we respectfully seek further clarification on the following:</p> <ul style="list-style-type: none"> <li data-bbox="730 846 1173 880">i. Scope and nature of discussions <p>We would welcome clarification on the focus of consultations between Ofcom, the CAA, and other Government departments when such a request is received. Specifically, we seek to understand whether these discussions consider technical compatibility, ITU regulatory compliance, national security, commercial considerations or broader policy objectives. Greater transparency would help licensees anticipate the scope of engagement and the regulatory context in which such decisions are made.</p> <ul style="list-style-type: none"> <li data-bbox="730 1272 1241 1305">ii. Regulatory accountability and liability <p>It would also be helpful to clarify which party holds responsibility for regulatory compliance during the use of the satellite by the foreign administration. In particular, we ask whether the UK licensee remains fully accountable for compliance, including matters such as interference and ITU coordination, or whether responsibility is shared or transferred.</p> <ul style="list-style-type: none"> <li data-bbox="730 1619 1332 1653">iii. Consideration of strategic use of UK Satellites <p>We recognise that the use of a UK-licensed satellites by other administration for bring-into-use (BIU) is permitted under international regulatory frameworks and can facilitate coordination. At the same time, we note that such arrangements could, in some cases, be used to preserve filing rights in the Master Register (MIFR) without immediate or sustained operational deployment.</p>

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	<p>We therefore suggest that Ofcom consider applying proportionate level of review to such requests, ensuring they are supported by a credible operational plan and remain aligned with the original purpose of the filing. This would help safeguard the integrity of the filing process and encourage the effective use of UK-licensed satellites in line with international coordination principles.</p> <p>We offer this suggestion in the interest of promoting transparency and sound regulatory practice, while recognising the value of flexibility in managing complex filing arrangements.</p> <p><u>Space sustainability</u></p> <p>Astroscale welcomes the addition of space sustainability guidance in Section 4. This is a positive and timely step, particularly in light of the UK Government’s emphasis on ‘Safety and Sustainability’ in its 2024 Space Regulatory Review. In doing so, Ofcom rightly acknowledges its role in supporting the long-term sustainability of orbital resources, consistent to its remit on efficient use of spectrum and orbit resources without duplicating the CAA’s licensing role.</p> <p>We welcome Ofcom’s initiative to encourage all applicants, including those not licensed by the CAA, to adhere to relevant guidelines on space sustainability such as the IADC Space Debris Mitigation Guidelines.</p> <p>That said, we would like to offer the following comments and suggestions to further strengthen the guidance:</p> <p>While UK-licensed satellite operators are required to meet space sustainability obligations through the CAA, including the submission of operational safety and end-of-life plans, operators using UK registered satellite filings but not licensed by the CAA may or may not be subject to equivalent obligations under UK law, as their licensing and regulatory oversight rests with their respective national regulator or licensing authority. Ofcom’s role in such cases is understandably focused on ITU compliance and UK spectrum policy.</p> <p>However, given the importance of space sustainability and the increasing of orbital activity, we believe there is</p>

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	<p>value in encouraging greater transparency and consistency from all users of UK satellite filings.</p> <p>To support this objective, we respectfully suggest that Ofcom consider the following additions to its Procedures:</p> <ul style="list-style-type: none"> i. Optional sustainability declaration <p>Applicants using UK filings could be invited to confirm, particularly at the point of BIU, that they have a space debris mitigation plan in place. They could also indicate whether such a plan was required by their licensing administration.</p> <ul style="list-style-type: none"> ii. Discretionary submission of mitigation plan <p>Ofcom may wish to reserve the right to request a copy of the mitigation plan on a case-by-case basis, for information purposes. This would not constitute a regulatory requirement but would provide Ofcom with greater visibility into the sustainability practices associated with UK satellite filings.</p> <ul style="list-style-type: none"> iii. Voluntary checklist or statement <p>Alternatively, applicants could be encouraged to submit a brief statement or checklist outlining their consideration of relevant sustainability guidelines. This would promote best practice without introducing additional regulatory requirements.</p> <p>These measures would encourage responsible conduct, maintain a level playing field between UK-licensed operators and foreign operators using UK satellite filing, and support the UK's leadership in advancing space sustainability.</p> <p>While these suggestions are non-binding in nature, they would signal Ofcom's proactive stance on space sustainability and help ensure that UK-registered filings are not used in ways that diverge from the national policy objectives.</p> <p><u>Radio Regulations No. 4.4</u></p> <p>We support the proposed inclusion of guidance on Regulation No. 4.4. Clearly outlining the circumstances under which Ofcom will consider frequency use requests that</p>

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	<p>do not conform to the existing ITU service allocations of- fers operators greater clarity and predictability for inno- vative use cases.</p> <p>The requirement for evidence of interference mitigation, contact details and the ability to cease transmission en- sures that non-conforming uses remain safe for incum- bent services. This balanced approach enables innova- tion while maintaining the spectrum environment.</p> <p><u>Applications for UK2.1 frequencies</u></p> <p>Astroscale welcomes the proposed clarification regarding the application of UK2.1 frequencies under the UK Fre- quency Allocation Table (UKFAT). This is an important and timely addition, particularly given the increasing in- terest in these frequencies and their authorisation by Ministry of Defence (MOD). The added clarity is espe- cially valuable as we explore the frequency bands to sup- port in-orbit servicing and space sustainability missions, for which clear guidance on accessing these bands is es- sential.</p> <p>While we understand and support the need for MOD consultation, we are concern that the two-stage consul- tation process, before initial submission to the ITU and fi- nal notification, could create uncertainty for applicants. This is especially significant given the investment re- quired in coordination activities and system develop- ment.</p> <p>The absence of clearly defined MOD assessment criteria or timelines may result in operators proceeding in good faith only to encounter unexpected constraints or rejec- tion at a later stage.</p> <p>To help mitigate the risk, we respectfully suggest that Ofcom:</p> <ul style="list-style-type: none"> i) Consider providing indicative timelines or broad criteria for MOD objections; and

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	<p>ii) Explore the possibility of a form of conditional approval for provisional feedback following the initial MOD consultation.</p> <p>Such steps would improve regulatory certainty, allowing for better planning and alignment with MOD priorities.</p>
<p>Question 3: Do you have any additional comments on areas of our Procedures which you consider need updating, e.g. to provide additional clarity or to deal with factual errors or omissions? If so, please explain which areas and the reasons for your response.</p>	<p>Confidential? – N</p> <p>We acknowledge and appreciate Ofcom’s continued efforts to provide clear and comprehensive guidance on satellite filing procedures. These resources are an important support for operators navigating the complexities of the ITU satellite filing process.</p> <p>In the interest of further enhancing the clarity and usefulness of the Procedures, we respectfully offer the following suggestions for Ofcom’s consideration:</p> <p><u>BRIFIC Special Sections Commenting</u></p> <p>We believe the Procedures could benefit from greater clarity on the process for submitting responses to BRIFIC Special Sections. Certain aspects would be improved by more detailed guidance, particularly for operators less familiar with the process.</p> <p>To make this process more straightforward and user-friendly, we suggest that Ofcom consider highlighting the use of its BRIFIC Commenting System under “Special Section Publications” (e.g., paragraph 7.29–7.36) to clearly identifies the platform as the primary tool for submitting responses. Including a direct link to the system would further improve its accessibility.</p> <p><u>Facilitating Access to Relevant Tools and Guidance</u></p> <p>To further improve the clarity and accessibility of the Procedures, we respectfully suggest that Ofcom consider including references or hyperlinks to key supporting resources. For example, links could be provided to:</p> <ul style="list-style-type: none"> i. Relevant sections of the Ofcom website, including the BRIFIC Commenting System, with reference to the embedded submission guide; ii. ITU software tools; and iii. ITU filing procedures/guidelines.

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	<p>Consolidating these links in a clearly accessible section of the Procedures would provide an efficient way to access the most current and comprehensive information, thereby enhancing ease of navigation.</p> <p><u>Facilitating Engagement for IOS/ADR Activities</u></p> <p>While this may extend beyond the immediate scope of the current Procedures, we respectfully suggest that Ofcom consider facilitating targeted engagement opportunities such as regulatory or technical workshops, or a working group focused on ISAM. This could be a helpful step towards identifying potential future updates to the Procedures, particularly as these operations continue to evolve beyond traditional satellite models. Such an approach would ensure that the Procedures remain aligned with the latest developments in the commercial space sector.</p> <p>These forums would also provide a valuable platform for operators and regulators to share insights on regulatory requirements, operational considerations, and challenges, thereby supporting Ofcom in staying informed of developments in this growing area.</p> <p>As outlined in the 2024 Space Regulatory Review, the UK Government identified ‘Safety and Sustainability’ as one of its key regulatory priorities for the UK space environment. In this context, we respectfully suggest that Ofcom continue to align its regulatory approach with the UK’s broader objectives in promoting space sustainability and innovation. This includes supporting regulatory clarity and certainty for emerging activities such as ISAM, which are playing an increasingly significant role in enabling a sustainable space environment. Doing so would not only reinforce the UK’s leadership in promoting safe and sustainable space operations but also provide greater regulatory confidence for all parties contributing to these important objectives.</p>

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