

# Consultation response form

## Your response

Question	Your response
<p><b>Question 1:</b> 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>Regarding <b>item 2.44</b> of the Draft Procedures, we seek clarification on what type of additional information is being referred to. The examination under Article 22 is already implemented within the ITU software, which indicates whether a filing is compliant with the established limits. Therefore, we believe that requesting additional specifications regarding the NGSO system’s operation may be redundant.</p> <p>Concerning <b>item 2.47</b>, GSOA is of the view that operators should comply with all elements of their filing—not solely the EPFD masks. As such, it is unnecessary for Ofcom to explicitly require compliance with EPFD masks alone. GSOA proposes the following revised paragraph:</p> <p><i>Operations of non-GSO satellite systems are expected to be carried out within the envelope set out by the filing and by the masks supplied, <del>and applicants will be required to supply a letter of commitment to Ofcom indicating that they shall not operate outside of the limits specified by the mask.</del></i></p> <p>For <b>items 2.59 to 2.62</b> on NGSO orbital-tolerance, GSOA notes that resolves 7 of Resolution 8 (WRC-23) is missing and should be included for completeness.</p> <p>Additionally, for <b>items 2.55 to 2.62</b>, the text primarily outlines the provisions of the ITU Radio Regulations without specifying what needs to be submitted to Ofcom. GSOA suggests this section could be simplified to state:</p> <p><i>Resolutions 35 and 8 of the ITU Radio Regulations (WRC-23) will apply to UK filings where appropriate.</i></p>

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<p><b>Question 2:</b> 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>GSOA would like to further add the following comments:</p> <p>a) Regarding <b>item 3.4</b>, GSOA requests that, in cases where data is to be shared by Ofcom with UK Government departments or agencies, the operator should be informed of the reasons for such disclosure.</p> <p>b) GSOA actively supports international space sustainability efforts and fully endorses space sustainability industry practices. GSOA supports the proposed text encouraging operators to adhere to relevant international guidelines on space sustainability, including the IADC Space Debris Mitigation Guidelines, while avoiding duplication of requirements.</p> <p>For <b>item 9.3</b>, GSOA suggests that further clarification may be required regarding the term “wider regulatory obligations,” to ensure a clear understanding of its scope and implications. We understand this to refer only to satellite operators wishing to provide services directly to consumers / end-users.</p>
<p><b>Question 3:</b> 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? – Y / N</p> <p>In the <b>deliverables for stages 5, 6, 7, and 8</b> of the Due Diligence process, it is requested that the data be provided two months in advance of the ITU deadline. GSOA is of the view that this timeframe is excessive, and that providing the data one month in advance would be sufficient for processing purposes.</p>

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