



Ofcom Consultation:

## Updates to Procedures for the management of satellite filings

# Response by the Radio Society of Great Britain

May, 2025

The Radio Society of Great Britain (RSGB, [www.rsgb.org](http://www.rsgb.org)) provides our response and comments related to this Ofcom consultation on updating satellite filing procedures [1] .

Our volunteers support the International Amateur Radio Union Satellite Frequency Coordination Panel, which recently marked handling their 1000<sup>th</sup> frequency coordination request [3]

The majority of these are in our popular 145 and 435 MHz allocations.

The RSGB and affiliated groups thus have an interest in the growth and protection of the amateur satellite service, which has supported a variety of innovative amateur radio and educational missions.

Whether it is this response, or related matters, we welcome further engagement.

*RSGB, May-2025*

### References:

- [1] Consultation: Updates to Procedures for the management of satellite filings, March-May-2025  
<https://www.ofcom.org.uk/spectrum/space-and-satellites/updates-to-procedures-for-the-management-of-satellite-filings>
- [2] IARU Satellite Coordination  
<https://www.iaru.org/reference/satellites/>
- [3] IARU Satellite Frequency Coordination Reaches 1,000th Milestone  
<https://www.iaru.org/iaru-satellite-frequency-coordination-reaches-1000th-milestone/>
- [4] ITU-R Small Satellites Support  
<https://www.itu.int/en/ITU-R/space/support/smallsat/Pages/default.aspx>

**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.*

**RSGB:** No Comment

**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*
- d) applications for UK2.1 frequencies?*

*If not, please specify which part you disagree with and provide reasons for your response.*

**RSGB:**

In regarding of usage under ITU RR4.4:-

- Regarding bullet point (b) of the new draft:  
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.
- Regarding bullet point (c) of the new draft:  
The inappropriate use of 4.4 is a concern. For example we have seen this sometime inaccurately referred to as the 'experimental satellite service'.

We are pleased to see Ofcom recognise this, but perhaps a further clarification in the proposed text may more explicitly state that 4.4 usage is not under any ITU service, as well as being on a non-protected, non-interference basis. Please also see our answer to Q3 where 4.4 usage can add to such concerns.

**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.*

**RSGB:**

Regarding extra guidance/omissions...

We have concerns that can arise from filings...

- a) where an inappropriate request is made in the amateur satellite service
- b) where transmissions from a (typically non-amateur) request/satellite that may be in shared spectrum has the potential to cause interference to amateur terrestrial usage, such as our weak signal sub-bands or repeater inputs

Therefore we would also appreciate Ofcom including some reference to the ITU-recognised IARU Satellite Panel and ITU Small Satellite advice [4] for where applications may utilise amateur satellite service allocations.

This may particularly assist educational and scientific institutions who are less familiar with formal satellite filing procedures.