

Future authorisation of the 1900–1920 MHz band

BT's response to Ofcom's Statement
and further consultation issued on 24
October 2025



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BT Group

1 Introduction

BT welcomes Ofcom's decision¹ to authorise 1910–1915 MHz for ESN Gateways. This will enable BT as the contracted ESN provider to support the Government's requirements for extending mobile network coverage for emergency services in locations not otherwise adequately covered. The ESN gateway application is currently developed to operate in the 1900-1910 MHz band and the further proposals that Ofcom is consulting on are helpful to support transition to the new 1910-1915 MHz band.

Our response to the consultation questions is provided in section 2 below.

2 Response questions

Question 1:

Question 1: Do you have any views on our proposal to allow access to the 1910–1915 MHz spectrum for use by ESN gateways prior to 3 April 2029?

BT supports Ofcom's proposal to authorise use of the 1910-1915 MHz band by ESN gateways sooner than 4 April 2029.

The 1910 – 1915 MHz spectrum is understood to not be in use and it would facilitate a smooth transition if access to this new spectrum band for ESN gateways could be facilitated earlier than the period when the revocation of the existing licences ends.

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The annual licence fee of £364,500 that Ofcom has decided on for the ESN gateway use is unnecessarily high², particularly if it were to apply prior to 4 April 2029 when the non-interference and non-protected licence clause in the ESN gateway licence would be in place. The early use would be very limited and the fee would be unnecessary to achieve Ofcom's statutory objectives, in particular setting fees aimed to promote efficient use of this spectrum.

If the full fee for ESN gateways in 1910-1915 MHz were to be payable for the use prior to 4 April 2029, BT invites Ofcom to also have an alternative, and lower cost, option of issuing a temporary non-operational licence for testing operations of the ESN gateway in the new 1910-1915 MHz band. Our preference, however, would be for Ofcom to not charge a fee for early limited use of the new ESN gateway licence. The migration of the spectrum use from 1900-1910 MHz to 1910-1915 MHz to support Ofcom's spectrum management objectives has

¹ [Statement and further Consultation: Future authorisation 1900-1920 Mhz band](#)

² See section 6 of BT's response to the March 2025 consultation <https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/future-authorisation-of-the-19001920-mhz-band/responses/bt.pdf>

already given rise to additional development costs to BT that have not been compensated. If a fee prior to 4 April 2029 is unnecessary to achieve Ofcom's statutory objectives then it should not be imposed.

Question 2:

Do you have any views on our proposed licence term requiring the licensee to operate on a non-interference, non-protection basis prior to 3 April 2029?

BT agrees with Ofcom's proposal that, in the period prior to 4 April 2029, the ESN gateway use in the 1910-1915 MHz band would be on a non-protected and non-interference basis. The risk of interference would be very low given the limited numbers of gateways likely to be in operation prior to this date, and our expectation based on information from the earlier consultation process that the spectrum would otherwise likely remain unused.



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