

Your response

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<p>Question 1: Do you agree with our proposal to authorise gateways (NGSO and GSO) in urban HD areas? Please explain your reasons.</p>	<p>Yes, we strongly agree with the proposal to authorise gateways in urban High Demand (HD) areas.</p> <p>This approach would provide important flexibility for satellite operators to deploy gateway infrastructure where it can deliver the greatest benefit to network performance and user experience. Urban HD areas typically coincide with high population density and strong demand for broadband services, making them logical locations for gateways that can support lower latency, higher throughput, and improved resilience for end users.</p> <p>Additionally, locating gateways closer to areas of high traffic demand allows for reduced backhaul distances, and better overall service quality, which directly supports the UK's digital economy objectives.</p>
<p>Question 2: Do you agree with our proposal to limit receive frequencies available in urban HD areas to 37.5 – 40.5 GHz, and for operations to be on:</p> <p>(a) a 'non-interference' basis with respect to fixed links and mobile services in the downlink direction,</p> <p>(b) a 'non-protection' basis with regards to adjacent mobile services in 40.5-43.5 GHz?</p> <p>Please explain your reasons.</p>	<p>We do not agree with the proposal to limit receive frequencies available for gateways in urban High Demand (HD) areas to 37.5–40.5 GHz, nor with the proposal to authorise operations exclusively on a 'non-interference' and 'non-protection' basis.</p> <p>The 37.5–42.5 GHz range is allocated to the Fixed-Satellite Service (FSS) on a co-primary basis in the ITU Radio Regulations. Given this co-primary allocation, it may not be necessary to licence satellite gateway operations on a subordinate no-interference/non-protection basis. Standard coordination procedures should be sufficient to ensure harmonious coexistence with other services, while granting satellite gateways appropriate protection rights consistent with their regulatory status.</p> <p>As such, there should be no artificial limit on the frequencies available to be authorised for gateways within the co-primarily allocated spectrum. A more flexible, primary-basis approach would allow operators to make full and efficient use of the band, optimise network performance and capacity, and better support the delivery of high-speed satellite broadband services across the UK. This would also promote greater spectrum efficiency overall.</p>

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<p>Question 3: Do you agree with our recommended option A for managing co-existence with Ofcom coordinated fixed links through our usual, first-come, first-served coordination. Please explain your reasons</p>	<p>We believe Option A is not well suited to High Demand urban environments.</p> <p>In locations with dense fixed link deployments, a first-come, first-served approach could significantly constrain opportunities for gateway siting, limiting the ability of satellite operators to deploy in optimal locations that best serve growing broadband demand.</p> <p>We recommend that Option B (Future-focused coordination) be adopted. This option is a more balanced and practical approach. Under Option B, new gateways would be added to Ofcom’s licensing database for full coordination with future fixed link deployments. This provides gateway operators with greater deployment flexibility and speed in urban HD areas, while ensuring long-term protection and coordination for new fixed links going forward.</p> <p>It strikes a fair compromise between supporting the rapid growth of satellite services and safeguarding incumbent and future users through targeted, forward-looking coordination.</p>
<p>Question 4: Do you agree with our proposal to authorise NGSO gateways in ‘high density’ areas at a MEA of at least 20 degrees and GSO gateways at an MEA of at least 15 degrees. Please explain your reasons.</p>	<p>We do not agree with the proposal to set a higher minimum elevation angle (MEA) of 20 degrees for NGSO gateways in high density areas.</p> <p>Aligning the MEA requirement at 15 degrees for both NGSO and GSO gateways would promote regulatory consistency, provide operators with greater siting flexibility in dense urban environments, and support more efficient network performance without compromising incumbent services, especially given standard coordination procedures. A stricter 20-degree threshold for NGSO systems is therefore unnecessary given these safeguards and could unnecessarily constrain deployment options and capacity delivery for next-generation satellite broadband.</p> <p>We recommend a uniform MEA of 15 degrees for both NGSO and GSO gateways.</p>
<p>Question 5: Do you have views on the benefits of additional co-channel access for gateways in 40.5-42.5 GHz in future, and how the interference risks we have identified could be mitigated in practice (including through gateway</p>	<p>Yes, we see significant potential benefits in enabling additional co-channel access for satellite gateways in the 40.5-42.5 GHz range, more immediately and in the future.</p>

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<p>shielding and site locations, and discussions between gateway operators and the MNOs). Please provide supporting analysis, as appropriate.</p>	<p>In an era of rapidly expanding data usage (driven by AI, video, cloud services, the benefits of access to this additional spectrum cannot be overstated - substantial increase in gateway capacity and throughput, enhancement of net-work resilience, support for lower latency applications, etc., - ultimately maximising the contribution of satellite services to the digital economy.</p> <p>The identified interference risks with mobile services can be effectively managed in practice through a combination of technical and operational measures (Gateway shielding, Strategic site locations, Operator-to-operator discussions and coordination, etc.).</p> <p>If required, we can provide analysis that will add technical context.</p>
<p>Question 6: Do you have any further comments on our Consultation proposals?</p>	<p>[CONFIDENTIAL]</p>

Please tell us how you came across this consultation.

- Email from Ofcom
- Saw it on social media
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- Found it on another website
- Heard about it on TV or radio
- Read about it in a newspaper or magazine
- Heard about it at an event
- Somebody told me or shared it with me
- Other (please specify)

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