Your response

Question	Your response
Question 1: Do you agree with our proposal to authorise gateways (NGSO and GSO) in urban HD areas? Please explain your reasons.	Confidential? – N Viasat appreciates the opportunity to respond to Ofcom's additional consultation on Expanding Spectrum Access for Satellite Gateways ("Consultation"). The consultation proposes authorising parts of the Q/V band for use by geostationary ("GSO") and non-geostationary ("NGSO") satellite gateway systems in high-density urban areas. As noted in our previous response[1], the Q/V band is critical to the future success of the satellite industry. We therefore welcome Ofcom's proposal to enable the use of this spectrum for gateways in high-density urban areas. We also support Ofcom's view that providing this additional spectrum access in high-density urban areas could offer gateway operators greater flexibility in deployment locations, enabling them to benefit from proximity to other urban infrastructure, such as data centres.
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: (a) a 'non-interference' basis with respect to fixed links and mobile services in the downlink direction, (b) a 'non-protection' basis with regards to adjacent mobile services in 40.5-43.5 GHz? Please explain your reasons.	Confidential? – N Viasat does not consider a non-interference, non-protection regime adequate in all cases —particularly for GSO satellite downlinks, where operators have limited practical ability to mitigate interference from fixed links or mobile services. Unlike in some NGSO systems, which can employ dynamic mitigation techniques (beam steering, rapid handover, dense scheduling), GSO gateways rely on fixed, high-sensitivity receivers with stable beam pointing. Shielding is often inefficient or impossible when mobile base stations or fixed point-to-point links align with the gateway's main beam, leaving no alternative pointing options. Consequently, GSO systems lack practical means to counter large, uncoordinated

[1] https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/qv-band-consultation/responses/viasat.pdf?v=407370

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	ground interference quickly, making them inherently vulnerable to service disruptions. CEPT also concluded that there is a small probability of interference to FSS earth stations from MFCN equipment using the Operating Band Unwanted Emissions (OBUE) limits in sub-urban areas. CEPT recommended coordination. A non-interference, non-protection framework introduces commercial and operational uncertainty, particularly for GSO gateways. Gateway operators must assume a protected radio environment to: • Size link margins accurately • Design redundancy measures • Meet service level agreements (SLAs) Without guaranteed protection, operators cannot reliably forecast availability, discouraging investment in new gateways or upgrades. This uncertainty undermines bankability, as licensing terms that expose gateways to harmful interference deter financing for long-term infrastructure projects. Gateways are long-lived, capital-intensive assets, requiring regulatory certainty to justify planning, financing, and deployment. The substantial investment—spanning site acquisition, fibre connectivity, power infrastructure, and operational costs—demands assurance that spectrum rights and interference protections will remain intact throughout the gateway's operational lifetime. Licensing terms that fail to shield gateways from interference jeopardise bankability, undermining the economic viability of satellite services. As a result, Viasat fully endorses Ofcom's original analysis, which concluded that Option A (first-come, first-served coordination) is the most effective means of ensuring coexistence. This approach would: • Minimise interference risks from surrounding fixed links; • Protect gateways from future deployments, safeguarding both operations and investments; and

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	• Provide the regulatory certainty necessary for long-term planning and financing. Such coordination approaches aligns with ECC Recommendations (22)01[2] and (22)02[3], as well as ERC Decision (00)02[4], which offer valuable guidance on coexistence between fixed services, MFCN, and satellite gateways. While some operators may accept a non-interference, non-protection regime in the 37.5–40.5 GHz band, Viasat maintains that this shifts operational and financial risks onto GSO operators—particularly investors with limited flexibility to address coexistence challenges. To balance flexibility with protection, Viasat proposes that Ofcom adopt a dual licensing model, allowing operators to choose between: • Coordinated Spectrum Access (as acted in non-high-density areas) • Ensures interference protection through Ofcom-led coordination • Facilitates local coordination between satellite and mobile operators where needed Non-Protection Operation, when preferred by operators could be permitted. This approach would cater to diverse operational needs while safeguarding the reliability, bankability, and long-term viability of satellite services. A blanket non-interference, non-protection framework is unsuitable for GSO gateways, which lack the flexibility to mitigate interference effectively. Viasat invites Ofcom to: • Reject a one-size-fits-all non-protection regime • Offer operators a choice between coordinated and non-protection regimes. This balanced approach will ensure regulatory certainty, protect investments, and maintain the reliability of satellite services for all users.

[2] https://docdb.cept.org/document/28572
[3] https://docdb.cept.org/document/28573
[4] https://docdb.cept.org/document/680

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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	Confidential? – Y / N We fully support Ofcom's recommended Option A, as it delivers the regulatory certainty essential for investing in and operating gateways across both low- and high-density environments. Additionally, if Ofcom would like to facilitate a non-interference non-protected framework for some operators, then we believe both options can be implemented concurrently to best address diverse operational requirements, removing any need for Ofcom to choose between them.
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.	Confidential? – Y / N Viasat does not have any comments at this stage.
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 shielding and site locations, and discussions between gateway operators and the MNOs). Please provide supporting analysis, as appropriate.	Confidential? – N CEPT concluded that there is a small probability of interference to FSS earth stations from MFCN equipment using the Operating Band Unwanted Emissions (OBUE) limits in sub-urban areas. Ofcom can consider using ECC recommendation (22)02 which provides some practical measures to achieve co-existence between gateways and mobile base stations notably using a database where location, height and pointing of MFCN BSs and FSS gateways are recorded to facilitate coexistence by: • Ensuring sufficient separation distances between MFCN BS and FSS gateways; • Mobile operators can avoid pointing their antenna within +/- 65 degree towards any existing FSS gateway located within 100m; • Ensuring a maximum relative height difference between the BS and ES antennas; • explore shielding options, etc¶

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Question 6: Do you have any further comments on our Consultation proposals?	Confidential? – N Viasat does not have any comments at this stage.

Please tell us how you came across this consultation.

- ☐ Email from Ofcom
- ☐ Saw it on social media
- ■ Found it on Ofcom's website
- ☐ 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)

Please complete this form in full and return to QVgateways@ofcom.org.uk.