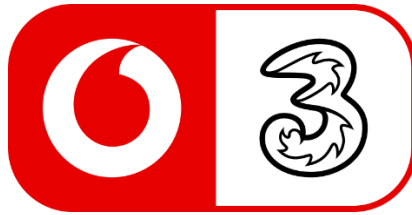


Response to Ofcom's Consultation:

**Proposals for use of Q/V band
gateways in 'high density' urban areas**

May 2026



Introducing VodafoneThree

In 2025, Vodafone UK and Three UK merged to become VodafoneThree. The merger signals the start of an exciting new chapter in UK communications, allowing citizens and consumers to benefit from a market leading new company that has the scale, resources and the innovative spirit to deliver game changing connectivity.

The merger signals not just a transition towards material enhancements in the UK's terrestrial mobile coverage, but it will create more opportunities such as the provision of D2D connectivity. VodafoneThree and our majority shareholder Vodafone plc operate satellite ground stations supporting both our own and third-party commercial operations.

To find out more about VodafoneThree, our brands and how we are building the United Kingdom's best network, visit: [Building the UK's Best Network | VodafoneThree](#)

Response

VodafoneThree welcomes that Ofcom has opened the Q/V band for usage by satellite gateways outside High Density Areas (HDAs). In our response to the previous consultation, we indicated that there need not be an outright prohibition on the deployment of Q/V band satellite gateways in HDAs, but this does not equate to our supporting a free-for-all in permitting such deployments. Instead, we believe that each application should be treated on its merits, recognising that the vast majority of UK geography and existing satellite gateway sites fall outside HDAs.

On the whole, we consider that HDAs represent a poor choice for the siting of satellite gateways – in particular Non-GeoStationary Orbit (NGSO) ones, as there will be poorer line-of-sight access and increased noise floors within these areas. We do not consider that access to suitable power and backhaul are reasons why a satellite gateway must fall in an HDA – there is ample access to these outside the HDAs. However, we do acknowledge that when establishing the HDAs, there was a degree of smoothing at the edges to simplify the associated polygons, and it is plausible that suitable locations for satellite gateways were inadvertently incorporated.

Whilst believing that each application should be considered on its merits, VodafoneThree acknowledges Ofcom's preference that there be a single rulebook for considering applications. A compromise would be that Ofcom sets principles for how it would consider such an application on its merits.

We consider that the starting point should be that satellite gateways, in particular NGSO gateways, should be located outside HDAs unless there is a compelling reason why a location within an HDA is required. This could be the pre-existence of a satellite gateway site, or that the applicant can provide evidence of being unable to find a suitable site outside an HDA. Applications where the site is at the edge of an HDA should be looked at more favourably than those that are in the centre of one.

We agree with the proposal that such gateways be restricted to 37.5-40.5GHz on the downlink on a 'non-interference, non-protection' basis, and that coordination with fixed links be based upon Option A as set out in the consultation. However, we do have a couple of caveats on this:

1. ✂ we consider that Ofcom should be clear that the authorisation is solely for the bottom 3GHz of the band and overtures to extend this would be rejected.
2. ✂. We therefore believe that a hybrid of Option A would be appropriate, i.e. for the period until 2028, Ofcom socialises any applications for satellite gateways in HDAs with the 40GHz licensees, to confirm that it would not compromise any plans they might have to vacate that band at that location.

We agree with the other aspects of Ofcom's proposals, in particular the minimum elevation angles in HDAs.