

## Your response

Question	Your response
<p><b>Question 1:</b> Do you agree with our proposal to update the Earth Station Network Licence to include a new provision authorising NGSO maritime services in the territorial seas of the UK and the Crown Dependencies? If you do not agree, please explain your reasons.</p>	<p>Confidential? – N</p> <p>Yes.</p> <p>OneWeb welcomes Ofcom’s proposal to update the Earth Station Network (ESN) license to authorise NGSO terminals on maritime vessels and offshore facilities to use the Ku and Ka band frequencies within the territorial seas of the UK and Crown Dependencies</p> <p>This clarification is crucial, and will greatly benefit NGSO satellite operators, the maritime and offshore industry, UK consumers and business, and government agencies, e.g., search and rescue, border protection.</p>
<p><b>Question 2:</b> Do you agree with our proposal to introduce a licence condition in relation to NGSO downlinks to protect GSO satellites, and earth stations communicating with GSO satellites? If you do not agree, please explain your reasons.</p>	<p>Confidential? – N</p> <p>Yes.</p> <p>OneWeb agrees with Ofcom’s proposed new condition in the ESN license under the proposed section 3.7 in the ESN license, with respect to NGSO satellite downlinks to gateways and terminals within the UK.</p> <p>As the consultation document states, the proposed new condition is based on the existing limits in Article 22 of the ITU Radio Regulations - with which operators should already be in compliance.</p> <p>The proposed condition will also provide consistency with the existing condition in the ESN license with regards to uplink transmissions.</p>

**Question 3:** Do you agree with our proposal to introduce a licence condition setting out requirements for the protection of radio astronomy from harmful interference in relation to NGSO downlinks? If you do not agree, please explain your reasons.

Confidential? – N

Yes.

OneWeb strongly supports appropriate and proportionate protections for radio astronomy from potential satellite downlink interference from unwanted emissions from signals in the adjacent band. It is a key part of our Responsible Space initiative which sets out a framework of principles and best practice on which the company, and other Space industry participants, can build a shared commitment to sustainability in Space.

OneWeb therefore welcomes the proposed ESN license condition to require specific protection of radio astronomy.

OneWeb would also suggest the Ofcom considers similar conditions, if these are not in place already, for downlinks of GSO networks which may also cause interfere to the radio astronomy receivers in the band 10.6-10.7 GHz.

**Question 4:** Do you agree with our proposal to introduce licence conditions setting out requirements for the protection of fixed links from harmful interference in relation to NGSO downlinks? If you do not agree, please explain your reasons.

Confidential? – N

Yes.

OneWeb agrees with Ofcom's proposed new condition in the ESN license to protect fixed wireless links in the 17.7-19.7GHz band.

As the consultation document states, compliance with the PFD limits in Article 21 of the ITU Radio Regulations to ensure sharing of terrestrial and satellites services is already checked prior to the acceptance of any satellite filing application.

**Question 5:** Do you have any additional comments regarding any of our proposals?

Confidential? – N

Yes

OneWeb would like to reiterate the need for a review of the UK's decision to auction the 28GHz band to terrestrial mobile operators for fixed wireless access (FWA) in 2000.

We know that only three countries in Europe auctioned part of the 27.5-29.5 GHz spectrum. This was done also based on the band segmentation proposals of ECC DEC(05)01. Over

the years the auctioned spectrum may have not been duly utilised.

As such, one country has decided to remove the auction licences at the end of 2024, allowing convivial sharing between different technologies. The other country allows the sharing of these FWA systems with FSS gateways (as envisaged by ECC DEC(05)01) through normal coordination mechanisms because feeder-link gateways can share frequencies geographically with the other technologies.

Therefore, OneWeb urges Ofcom to consider allowing gateway stations of FSS systems to operate across the whole of the 27.5-29.7 GHz band (in addition to 29.5-30 GHz) on a coordinated basis with other technologies, without the need to find commercial or financial solutions with licence holders. This would allow for more efficient use of spectrum by different technologies without the need to intervene through market-based mechanisms.