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21st January, 2026

Lacuna Space response to "Notice of proposals to make Wireless Telegraphy (Exemption)(Amendment) Regulations 2025" Ofcom consultation

Lacuna Space thanks Ofcom for the opportunity to participate in its consultation of Notice of proposals to make Wireless Telegraphy (Exemption)(Amendment) Regulations 2025. As expressed by Ofcom on its proposed Plan of Work 2026/27, there is a rapidly changing technological innovation environment across the telecommunication industry for a broad range of spectrum users. This raises new opportunities such as exploring how satellite communications could support transforming telecommunications in order to enhance economic growth and innovation. As a UK born company, Lacuna Space also recognizes that good spectrum regulation can encourage innovation and hence support economic growth in the country.

Founded in 2016, Lacuna Space like Ofcom thrives to enable wireless communication for all people, businesses and sectors in the UK through its low-power Satellite-IoT transmissions (Low power devices communicating with satellites (LPD-S) transmissions) and applications. Through the use of LPD-S transmissions in license-exempt bands, Lacuna Space was the pioneer of extending Short-Range Device (SRD) transmissions to space via satellites, creating a totally new landscape of opportunities for these low-power IoT applications in remote areas globally through the use of the 862-870 MHz band on an unprotected and non-interference basis. As a local company that strongly aligns with the aforementioned Ofcom vision, Lacuna Space would like to take this opportunity to kindly ask Ofcom to consider an adequate License-exempt regulatory framework to accommodate our LPD-S solutions in the 862-870 MHz band.

Importance of SRD Bands in the UK

As mentioned in Ofcom's proposed Plan of Work 2026/27, innovation has raised new opportunities, which we consider includes LPD-S transmissions in the 862-870 MHz band. With millions of terrestrial LoRaWAN devices deployed worldwide, the 862-870 MHz band plays a critical role in achieving the objectives for wireless services in the wider economy for a more sustainable future. The use of satellite connectivity in the UK as done by Lacuna Space, mitigates the need of any terrestrial infrastructure. Consequently, industries fundamental to the UK economic and sustainable development will be benefited such as but not limited to:

- Agriculture and farming;
- Environmental monitoring;
- Utility monitoring and management.

As a more concrete example, lack of connectivity leaves many rural businesses struggling to stay competitive. However, through the use of Satellite-IoT connectivity, precision farming techniques can optimise crop yield through real-time monitoring of soil conditions, weather and resource management.

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Extending SRD Transmissions to Satellite Networks via LPD-S

Satellite-to-device transmissions in the license-exempt 862-870 MHz band have already been validated and given regulatory treatment by the CEPT through ECC Report 357 "*Regulatory analyses of satellite use in the band 862-870 MHz to communicate with terrestrial SRD*," which proves that there can be coexistence of LPD-S transmissions with terrestrial SRD applications, and through ECC Decision (25)02 named "*Low power devices communicating with satellites (LPD-S) within the frequency range 862-870 MHz*" in order to give a regulatory framework for LPD-S transmissions in the CEPT region. Below, we summarise some background and key aspects of this Decision:

- CEPT found the uplink (device-to-satellite) to be in-line with the existing SRD regulations, as can be seen in ECC Report 357.
- In order to regulate downlink (satellite-to-device) transmissions, an additional framework was found in ECC Decision (25)02. To avoid potential naming conflicts with the term short-range device (SRD), the devices are named low-power devices communicating with satellites (LPD-S). However, the operational parameters are the same as for SRDs, i.e. following ERC Recommendation 70-03.
- For satellite-to-device transmissions, the Decision defines PFD limits proved to be not harmful. Satellite operators that want to communicate with LPDs can request through their administration to be added to an annex of the Decision and commit to not exceed the PFD limits established, and to adhere to additional limitations as mentioned in the annex. This assures that both device-to-satellite and satellite-to-device transmissions can co-exist with other spectrum users.

Lacuna Space appreciates the support that Ofcom has to improve connectivity and enable timely spectrum access for new generations of satellite and licence-exempt services and applications (such as LPD-S applications), which will in turn enable innovation and promote greater spectrum sharing. Lacuna Space believes that the regulatory treatment given by the CEPT in the aforementioned ECC Decision (25)02 aligns with the priority outlined by Ofcom of enabling wireless communication in the UK economy for all people, businesses and sectors. Moreover, Denmark has been the first CEPT country to implement such a Decision into its corresponding regulatory framework by explicitly authorising LPD-S transmissions under its licence exempt SRD framework, which reassures the regulatory feasibility of such treatment.

Lacuna Space would hereby respectfully like to ask Ofcom to consider and support Satellite-IoT applications in its "*Licence exempt Short Range Devices (SRDs)*" regulations through the use of LPD-S transmissions in the 862-870 MHz band. This will undoubtedly promote greater spectrum sharing across diverse applications which will foster economic growth and improved connectivity. ***As a UK-based company, Lacuna Space is ready to support and collaborate with Ofcom to implement LPD-S transmissions in its regulatory framework to fuel continued growth and innovation within the wireless IoT ecosystem***.