Your response

Question	Your response
Question 1: Do you have any comments on our drafting of the Proposed Regulations? Please give reasons supported by evidence for your views.	Confidential? - N We commend OFCOM's efforts to adopt a license-exempt framework in parallel with the technical studies undertaken by CEPT. In this regard, we respectfully support the proposed changes in IR 2030 for non-specific SRD devices.
Question 2: Do you have any comments relating to any other matter in this Notice?	Confidential? - N Satellite communications are increasingly transforming connectivity ecosystems globally, as they play a crucial role in extending coverage to remote and underserved areas where terrestrial networks are challenging or uneconomical to deploy. In this context, satellite-IoT solutions can play a pivotal role in bridging the digital divide by providing cost-effective, resilient, and seamless connectivity through supporting key applications such as agriculture, utilities, environmental monitoring, marine, transportation and other remote infrastructure monitoring. In addition, satellite-IoT-solutions provide resilient and reliable connectivity during emergency conditions, enabling backup communications and supporting use cases such as early warning systems and disaster response operations. Plan-S is a satellite operator committed to addressing these coverage challenges and to fostering a sustainable and competitive IoT ecosystem. Through the Connecta IoT System, a next-generation satellite system optimised for massive narrowband IoT connectivity, Plan-S delivers high reliability, interoperable, strong resilience, and global coverage with exceptional cost efficiency. **Satellite-to-IoT Communications in License-Exempt Band** Plan-S intends to operate direct-to-satellite IoT connectivity based on the LoRaWAN standard in the 862-870 MHz band in the UK. **Current Developments in Europe** In Europe, satellite-IoT operations in license-exempt SRD bands, specifically in the 862-870 MHz band, have been validated through extensive technical studies, field trials, and early deployments. In this context, the first regulatory studies have been completed with **ECC Report 357** - *"Regulatory analyses of satellite use in the band 862-870 MHz*

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	to communicate with terrestrial SRD", to enable satellite communications in the 862-870 MHz band. Following the publication of this Report, CEPT has adopted **ECC Decision (25)02** - *"Low power devices communicating with satellites (LPD-S) within the frequency range 862-870 MHz"*, providing a harmonised regulatory framework for satellite IoT operations in the 862-870 MHz band for CEPT member countries. **This regulatory development represents a transformational shift in global spectrum policy, allowing satellite IoT operations in license-exempt bands. This supports interoperability with terrestrial LoRaWAN networks, leverages the economies of scale of the LoRaWAN standard, and encourages growth in the broader IoT ecosystem.** During the adoption of this Decision, the UK indicated that it is not in a position to implement ECC Decision (25)02 due to the regulatory approach adopted in that Decision but it is supportive of LPD-S deployment in the UK and is considering what, if any, measures may be necessary to enable this. Plan-S welcomes and values the UK's commitment to enabling satellite use of the 862-870 MHz band, which has the potential to enhance competition in the IoT market and to improve spectrum efficiency by introducing a satellite component into a band currently used exclusively by terrestrial applications. Plan-S believes that the regulatory approach set out in ECC Decision (25)02 is fully aligned with the conditions under sections 8(4) and 8(5) of the Wireless Telegraphy Act. In particular, the Decision ensures that exempt equipment: • Is not likely to involve undue interference and does not adversely affect quality of service for incumbent users, due to very conservative PFD limits and non-interference operation basis usage, • Promotes efficient use of spectrum by introducing new dimension of spectrum currently only used by terrestrial SRD through enabling satellite usages,

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	• Supports effective frequency sharing arrangements through harmonised, technology-neutral conditions, • Does not endanger safety of life, given alignment with the conditions set out for terrestrial SRD, and • Supports broader societal objectives, including connectivity for remote, rural, and maritime areas. Furthermore, Plan-S believes that the technical conditions in ECC Decision (25)02 meet the requirements of section 8(3B) of the WT Act, as they are: • Objectively justifiable, being based on detailed compatibility studies and real-world usages, • Non-discriminatory, applying equally to all compliant satellite-IoT systems, • Proportionate, imposing only those constraints necessary to protect incumbent services and applications, and • Transparent, with clearly defined and measurable technical limits. **The Connecta IoT Network operates on a clear non-interference basis and is unlikely to cause harmful interference or adversely affect the quality of service of incumbent users, as ensured by conservative power flux density limits. It promotes efficient use of spectrum by extending SRD spectrum, traditionally used only for terrestrial applications, to satellite-enabled use cases. The framework supports effective and predictable frequency sharing through harmonised and technology-neutral conditions, does not endanger the safety of life due to full alignment with the operational requirements applicable to terrestrial SRD, and contributes to broader societal objectives by enabling connectivity in remote, rural, and maritime areas.** Denmark's recent adoption of ECC Decision (25)02, making it the first European country to expressly permit satellite IoT operations in SRD bands under a licence-exempt regime, further demonstrates the feasibility and regulatory robustness of incorporating this framework in license-exempt regulation.

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	Plan-S respectfully recommends that Ofcom amend the Wireless Telegraphy (Exemption) Regulations to reflect the framework set out in ECC Decision (25)02 within the UK regulatory approach, in order to enable satellite operations in the 862-870 MHz band, as such an approach would ensure alignment with European best practices, foster competition and innovation in satellite industry, and fully meet the statutory requirements of the WT Act.

Please tell us how you came across this consultation.

- ☐ Email from Ofcom
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- ☐ 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)

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