

Your response

Question	Your response
<p>Question 1: Do you anticipate these NGSO gateway earth stations will pose coexistence challenges to existing NGSO systems?</p>	<p>Confidential? – N</p> <p>Amazon Leo¹ appreciates the opportunity to comment on Starlink’s application for two new Ka-band gateway licenses: one for operations at Mulberry Wharf, London, and the other for operations at Harlow, Essex. As discussed further below, Amazon Leo does not object to Ofcom’s approval of these gateway licenses, as good faith coordination will continue between Starlink and Amazon Leo to ensure technical coexistence.</p> <p>Coexistence with Existing NGSO Systems</p> <p>To adequately assess technical coexistence with existing non-geostationary satellite orbit (NGSO) operations, Ofcom requires applicants to demonstrate how coexistence is possible between their NGSO gateway and other NGSO systems or gateways already licensed in the UK (as well as any NGSO license applicant’s systems or gateways) that operate in the same frequency bands(s).² This should include both ubiquitous user terminals and gateways.³</p> <p>This comprehensive approach to coexistence analysis is essential to ensure the efficient use of spectrum resources and to protect the investments and operations of all NGSO licensees. By requiring applicants to demonstrate technical compatibility with both existing and future systems, Ofcom promotes a competitive marketplace where multiple operators can deploy innovative services without causing harmful interference to one another. This framework encourages good faith coordination among operators and provides regulatory certainty for all stakeholders in the UK satellite communications sector.</p> <p>Amazon Leo’s UK Operations and Authorization</p> <p>Amazon Leo is committed to providing high-speed, reliable broadband services to customers in the UK,</p>

¹ Amazon Kuiper UK Limited (d/b/a “Amazon Leo”) is a wholly owned subsidiary of Amazon.com Services LLC (collectively, “Amazon”). On November 13, 2025, Amazon replaced the Project Kuiper code name with Amazon Leo, its permanent brand for its satellite broadband network.

² See Ofcom, Consultation: Request for comments on Starlink application for two non-geostationary gateway earth station licenses, at §§ 3.3 and 3.8-3.11 (rel. 13 Mar., 2026) (“Starlink Gateway Consultation”).

³ See *id.*

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	<p>helping to bridge the digital divide and extend connectivity to unserved and underserved communities. Ofcom granted Amazon Leo’s application for an NGSO network license on 18 February 2025, authorizing Amazon Leo to provide NGSO Fixed-Satellite Service (FSS) to customers in the UK.⁴ This authorization reflects Amazon Leo’s commitment to delivering innovative satellite broadband solutions that expand connectivity options for residential, enterprise, and government customers throughout the country.</p> <p>Amazon Leo is also authorized to operate an NGSO gateway in the Ka-band at Bude, Cornwall.⁵ This gateway facility serves as a critical component of Amazon Leo’s network infrastructure, enabling high-capacity backhaul connectivity between the satellite constellation and terrestrial internet infrastructure.</p> <p>Analysis of Starlink’s Gateway Application</p> <p>Starlink’s application includes an analysis addressing coexistence between its two proposed gateways and Amazon Leo’s gateway site in Bude, Cornwall, even if the gateways were to be collocated. However, the application does not presently include an analysis addressing coexistence with Amazon Leo’s network and user terminals, which may be deployed across the entire UK.</p> <p>Amazon Leo is nevertheless of the view that coordination in this instance can be handled effectively at the operator-to-operator level between Starlink and Amazon Leo.⁶ The operator-to-operator coordination process provides flexibility for parties to develop mutually acceptable technical solutions tailored to their specific network architectures and operational parameters. This approach has proven effective in</p>

⁴ See Amazon Kuiper Services Europe SARL, Satellite (Earth Station Network) License No. 1377636 (granted 18 Feb. 2025).

⁵ See Amazon Kuiper UK Limited, Satellite (Non-Geostationary Earth Station) License No. 1401320 (granted 16 Dec. 2025).

⁶ Starlink has publicly stated its commitment to good faith coordination with other NGSO network earth station licensees. See Starlink Application for Two Non-Geostationary Gateway Earth Station Licenses, Narrative and Technical Annex, at pp.2 and 4 (filed 13 Mar. 2026). Cooperation with all NGSO licensees to facilitate coexistence is also required as a condition of Starlink’s NGSO network license. See Starlink Internet Services Limited, Satellite (Earth Station Network) License No. 1239247, § 8.2 (granted 16 Nov. 2020).

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	<p>facilitating coexistence among multiple NGSO operators and enables more efficient spectrum utilization.</p> <p>Conclusion</p> <p>Amazon Leo does not object to Ofcom’s approval of Starlink’s application for gateway licenses at Mulberry Wharf, London and Harlow, Essex, as good faith coordination continues between the parties. Technical coexistence between Starlink’s Ka-band gateways and Amazon Leo’s Ka-band gateway and user terminal operations is essential to enabling multiple operators to deliver competitive connectivity services to customers in the UK. We look forward to continue working constructively with Starlink to achieve this result through good faith coordination efforts.</p> <p>To enable comprehensive coexistence analysis in the future, Amazon Leo encourages Ofcom to remind future applicants that their analysis should address compatibility with both Gateway and User Terminals.</p>
<p>Question 2: Are the measures set out by the applicant to enable coexistence with future NGSO systems reasonable?</p>	<p>Confidential? – N</p> <p>Please see response to Question 1, above.</p>
<p>Question 3: Do you expect that granting these two NGSO gateway licences in the proposed locations would harm or benefit competition? If so, please explain why and where possible provide evidence to substantiate your submission.</p>	<p>Confidential? – N</p>
<p>Question 4: Do you have any additional concerns or comments regarding the application?</p>	<p>Confidential? – N</p>
<p>Question 5: Do you agree with our assessment of the potential impact of our proposal on specific groups of persons?</p>	<p>Confidential? – N</p>

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Question 6: Do you agree with our assessment of the potential impact of our proposal on the Welsh language?	Confidential? – N

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- 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)