



Richard Moore
Principal, Policy Advisor
Spectrum Group
Ofcom

14 November 2025

Dear Richard,

Request to vary Public Wireless Network Licence No. 0249663¹

Virgin Media O2 (VMO2), welcomes Ofcom's work to introduce an authorisation framework to enable the introduction of Direct to Device (D2D) services in the UK. Ofcom and VMO2 recognise that these services can deliver benefits to consumers and businesses in the form of mobile connectivity to supplement existing terrestrial coverage, and VMO2 shares Ofcom's aim to ensure UK consumers and businesses can benefit from these services as soon as possible.

In Ofcom's recent statement and further consultation - Enabling satellite direct to device services in mobile spectrum bands², Ofcom invited any MNO which plans to offer a D2D service, to come forward and contact Ofcom to request a variation to the wireless telegraphy licence relating to the specific band of interest.

VMO2 plan to offer a D2D service (O2 Satellite³) in early 2026, we are therefore contacting you to request a variation to our licence No. 0249663 (held under Telefónica UK Limited) that contains the frequencies we intend to use to provide the D2D service, which will be provided through our partnership with the Satellite Operator, Starlink.

As part of its recent consultation and statement, Ofcom published a draft D2D licence schedule which sets out the licence conditions it proposes should apply to any MNO wishing to offer D2D services, and that Ofcom proposes to include this schedule as a variation to the MNO's relevant spectrum licence, following receipt of a variation request.

As part of the request to vary a licence, Ofcom expects the MNO to provide the following:

- Details on the frequencies intended for use;
- Evidence of a commercial agreement between an MNO and a satellite D2D operator, including clauses requiring the satellite providers compliance with the technical conditions set out in Section 3 of the statement and further consultation document;
- Evidence of engagement with co-channel MNOs in neighbouring territories;
- Evidence of results from trials carried out in the United Kingdom; and
- PFD maps showing the intended service area.

We provide below, our response to each of these requests.

Details on the frequencies intended for use

¹ <https://www.ofcom.org.uk/siteassets/resources/documents/manage-your-licence/mobile-wireless-and-broadband/cellular/licences/cellular-licence.pdf?v=401903>

² [Statement and further consultation: Enabling satellite direct to device services in mobile spectrum bands](#)

³ [O2 Satellite | Connection that's essential for living](#)



Uplink: 1710.1-1715.9 MHz

Downlink: 1805.1-1810.9 MHz

Evidence of a commercial agreement between an MNO and a satellite D2D operator, including clauses requiring the satellite providers compliance with the technical conditions set out in Section 3 of the statement and further consultation document

Documentation will be provided separately.

VMO2 published a press release on 30 October 2025 announcing a multi-year partnership agreement with Starlink⁴.

Evidence of engagement with co-channel MNOs in neighbouring territories

Documentation will be provided separately.

Evidence of results from trials carried out in the United Kingdom

We expect to gather evidence from our trials and will be happy to share and discuss the details with Ofcom.

PFD maps showing the intended service area

Documentation will be provided separately.

We are happy to discuss any aspects of our licence variation request, and we look forward to your response.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'R. Vernon'.

Robin Vernon

Senior Regulatory Advisor – Infrastructure and Spectrum

Virgin Media O2

⁴ [Virgin Media O2 signs landmark partnership with Starlink to boost rural UK mobile coverage - Virgin Media O2](#)