Question	Your response
Question 1: Do you agree with our assessment of the business models that could potentially emerge?	Confidential? – N AST SpaceMobile is building the first and only space-based cellular broadband network accessible directly by everyday smartphones, and designed for both commercial and government applications. AST SpaceMobile agrees with Ofcom's assessment of the business models that could emerge. AST SpaceMobile has agreements with approximately 50 mobile network operators globally, which have nearly 3.0 billion existing subscribers globally. When operational, SpaceMobile Service will be available to MNOs on a wholesale basis.
Question 1(a): Are there any other business models that you think could deliver benefits for people and businesses in the UK?	
Question 1(b): Are there any business models that could not operate under our proposed approaches?	
Question 2: Do you agree with our assessment of the benefits that could be realised through authorisation of D2D services?	Confidential? – N AST SpaceMobile agrees that the potential benefits of enabling D2D services include:

Question	Your response
	• enabling ubiquitous, outdoor coverage of across 100% of the UK landmass • providing a degree of backup coverage during events such as natural disasters or extreme weather events, enhancing the resilience of mobile networks. AST SpaceMobile does see considerable potential benefit of D2D to UK consumers, businesses, and the public sector and expects the widespread benefits of D2D to be realised quickly following the launch of commercial services.
Question 2(a): Are there any other benefits for UK citizens and businesses that could be realised?	Confidential? – N AST SpaceMobile sees significant further potential benefits for UK citizens and businesses: • Achieving ubiquitous coverage for all Mobile Network Operators (MNOs), • Supporting the digitalisation of extractive, primary and secondary production – for example precision agriculture - which require improved geographical availability of mobile connectivity. • Enabling the ubiquitous availability of government applications, from emergency to e-government.
Question 3: Do you have comments on how emerging D2D technology should support 999 service provision?	Confidential? – Y [Confidential] [/Confidential]
Question 4: Are there any mobile spectrum bands not in scope of our proposals that you think we should consider?	Confidential? – Y [Confidential] [/Confidential]

Question	Your response
Question 5: Does deployment in supplementary downlink spectrum (SDL) present any challenges in comparison to other bands? Is there interest in deploying in this spectrum?	Confidential? – Y [Confidential] [/Confidential]
Question 6: Do you agree with our proposal to limit this authorisation to the UK mainland and territorial waters? If not, please explain why.	Confidential? – N AST SpaceMobile agrees with Ofcom.
Question 7: Do you agree that our proposed technical conditions for D2D satellite emissions will protect mobile services delivered by other operators in adjacent areas and in adjacent spectrum?	Confidential? – Partly confidential [Non Confidential] AST SpaceMobile agrees that the power limits proposed by Ofcom for D2D satellite emissions will protect mobile services delivered by other operators in adjacent areas and in adjacent spectrum. AST SpaceMobile agrees that the protection of IMT Base Station reception is an important objective, but is not convinced that setting a minimum elevation angle of transmission in the downlink bands is an effective way to protect IMT base stations receiving in an UL band. AST SpaceMobile is confident that adequate emission limits in the IMT UL bands can be identified without delaying the adoption of the regulatory framework. [/Non Confidential] [Confidential] [/Confidential]
Question 8: Do you agree with out high-level co-existence assessment for other services in adjacent spectrum to D2D?	Confidential? – N AST SpaceMobile agrees with Ofcom's out high-level co-existence assessment for other services in adjacent spectrum to D2D.

Question	Your response
Question 9: Are there other services co-channel or in adjacent spectrum that you think we should take into account when assessing coexistence? If so, please provide evidence of the nature of interference and what level of protection you consider is necessary.	
Question 10: Do you agree with our preferred authorisation approach (option 2)? If not, please set out your reasoning.	Confidential? –N AST SpaceMobile supports a regulatory framework that: • would provide Ofcom with the ability to take direct legal enforcement steps, when necessary, • would maximise the MNOs' control over the D2D authorisation process • would not lead to unnecessary regulatory burden to enable roaming or MVNO use of the D2D service. AST SpaceMobile agrees with Ofcom's preferred authorisation approach (option 2).
Question 11: Are there any alternative authorisation options, not discussed here, that you believe are worth considering?	
Question 12: Do you agree with the proposed conditions?	Confidential? – N AST SpaceMobile is willing to comply with the conditions proposed by Ofcom.
Question 13: Do you have any other comments on the proposals set out in this document?	Confidential? – N AST SpaceMobile invites Ofcom to adopt the proposed D2D regulatory framework as soon as possible and accept requests to offer these services as soon as possible and no later than by end 2025.

Please complete this form in full and return to mobilefromskyandspace@ofcom.org.uk.