

Please find below the Federation of Communication Services (FCS) response to your consultation “Enabling Satellite Direct to Device services in Mobile spectrum bands”. We have not provided answers to your individual questions, but we do have a couple of important points of principle to share. I can confirm that our response is not confidential, and we are happy for it to be shown on the Ofcom website.

The FCS represents companies which provide professional communications solutions to business users. Our members deliver telecommunications services via mobile and fixed line telephony networks, broadband, satellite, wi-fi and business radio. Our members’ customers range from SMEs, home-workers and micro-businesses up to the very largest private enterprises and public sector users. FCS is the largest trade organisation in the professional communications arena, representing the interests of circa 350 businesses which supply B2B services nationwide.

The FCS welcomes the opening of spectrum and increased sharing believing that it provides new opportunities to add value and to contribute to growth. Accordingly, the FCS welcomes this consultation and proposals that promote the efficient use of spectrum and facilitates the opportunity to promote a greater variety of services.

Whilst we have no comments on the technical questions raised, we would like to stress the importance of ensuring that the regulatory regime supports competition. It is vital that smaller CPs and resellers have access to new technology such as D2D services and the FCS believes that regulation should specifically require MNOs to provide wholesale access to such services on a fair and reasonable basis. There is no mention of this in the consultation and the FCS believes that suitable remedies should be included in the final regulatory conditions.

The FCS is comfortable with Ofcom’s proposals on the authorisation regime and have no specific comments on the various options set out in the consultation. The FCS agrees that Ofcom should review any authorisation framework following the outcome of the WRC-27.

The FCS agrees that a key element of the proposals should be to ensure that the new approach does not create instances of Harmful Interference. It is important to impose technical conditions for D2D services and to keep these under review. Ofcom performs assessments for SS-DAB deployments, and these have generally worked well.