



Comments on Ofcom public consultation on
Enabling satellite direct to device services in mobile spectrum bands
10 October 2025

Part of the response to question 1 below is confidential.

AST SpaceMobile welcomes Ofcom's statement and further consultation on enabling satellite direct to device services in mobile spectrum bands. AST SpaceMobile believes that Ofcom's proposed framework can enable delivery of space-based mobile broadband services directly to everyday smartphones, with significant benefits to UK users, customers and enterprises.

AST SpaceMobile is working closely with VodafoneThree to bring innovative connectivity to the UK and invites Ofcom to consider VodafoneThree response to the public consultation in addition to AST SpaceMobile comments below.

Question 1: Do you agree with our proposed additional technical conditions for using 2.6 GHz D2D services in order to protect 2.7-3.1 GHz radars?

[non-confidential]

AST SpaceMobile understands that the proposals are consistent with the coordination requirements that already exist in our terrestrial 2.6GHz spectrum licences.

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Question 2: Do you have any comments relating to the proposed licence conditions?

[non-confidential]

AST SpaceMobile support the principles behind the proposed licence conditions. AST SpaceMobile notes that the mobile operator seeking a licence variation is subject to requirements on:

- Specific frequencies of operation
- Need for contractual agreement
- Record requirements
- And cross-border communications/communications with co-channel users.

AST SpaceMobile underlines that the specific requirements for a licence variation should take into account the operational constraints of MNOs and not be unnecessarily specific. AST SpaceMobile recommends Ofcom to take into account VodafoneThree's feedback on these points. In particular, we do not consider that providing the actual contract between the Mobile Network Operator and the



Satellite Network Operator should be required and that a simple commitment to an agreement should be sufficient for Ofcom to grant the licence variation, subject to this commitment being fulfilled.

[/non-confidential]

Question 3: Do you have any comments on our drafting of the Proposed Regulations? Please give reasons supported by evidence for your views.

Question 4: Do you have any comments relating to any other matter in the Notice of Proposed Regulations?

[Non-confidential]

AST SpaceMobile notes that Ofcom is requiring evidence of results from trials carried out in the United Kingdom. While the position of the satellite, in particular the elevation angle, may play a role in the performance of the satellite, it is not obvious why results should be provided specifically from trials conducted in the UK. AST SpaceMobile does not expect trial results to be substantially different when conducted in the UK or in other countries. The requirement to provide results from trials conducted in the UK seem to introduce an unnecessary step. AST SpaceMobile requests Ofcom to consider accepting trial results, irrespective of the geographical location where the trials were conducted.

Apart from the request to provide results from trials conducted in the UK, AST SpaceMobile supports Ofcom's drafting of the Proposed Regulations as well as the Notice of Proposed Regulations.

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Respectfully submitted,

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