

Enabling satellite direct to device services in mobile spectrum bands

Further consultation

BT's response to Ofcom's consultation
issued on 9 September 2025

Issue: 1.0

10 October 2025

BT Group

1 Introduction

BT welcomes Ofcom's further consultation proposals¹, to authorise the use of spectrum bands used by the UK's Mobile Network Operators (MNOs) for satellite Direct to Device (D2D) services.

Our answers to the consultation questions are set out in section 2 below.

2 Response to consultation questions

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?

BT agrees that in the case of transmission from orbiting satellites, in-band emissions need not be considered as the power flux density levels at the earth would be far below the levels that would cause blocking of the adjacent band radar receivers.

Concerning the proposal to apportion permitted out-of-band interference power flux density (PFD) at the radar sites between the satellite and terrestrial base stations, two scenarios need to be considered:

- a) Radar is in satellite coverage – apportion interference between satellite and terrestrial.
- b) Radar is not in satellite coverage – full interference budget for terrestrial base stations.

[X]

We agree with the approach Ofcom proposes is appropriate in relation to the above scenario b), where the permissible interference level at the radar sites is apportioned between the terrestrial and satellite sources. However, setting this apportionment in the licence and coordination procedure in the way Ofcom proposes does not give flexibility separately cater for the scenario a) if it were to be relevant to some geographic locations.

We therefore can support Ofcom's proposal to apportion permissible interference between the satellite and terrestrial sources by a ratio that the MNO may consider appropriate, but believe the licence should clearly specify that the apportionment only applies to radar sites that may be located within the coverage area of the satellite service of the MNO.

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

BT has no comments.

¹ <https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/consultation-enabling-satellite-direct-to-device-services-in-mobile-spectrum-bands/main-documents/statement-and-further-consultation-enabling-satellite-direct-to-device-services-in-mobile-spectrum-bands.pdf>

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

BT has no comments.

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

BT has no comments.



10 October 2025

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