

Consultation response form

The Mobile Satellite Services Association (“MSSA”) respectfully submits its comments in response to Ofcom’s “Statement and Further Consultation: Enabling satellite direct-to-device (D2D) services in mobile spectrum bands.” MSSA is a non-profit industry association that seeks to promote and advance the emerging ecosystem for direct to device (“D2D”) and other advanced Non-Terrestrial Network (“NTN”) services. MSSA supports the efforts of advanced NTN solutions providers—including terrestrial mobile and satellite operators, original equipment manufacturers, infrastructure providers, chip vendors, and others. MSSA is focused on facilitating a global ecosystem utilizing spectrum already allocated and licensed for mobile satellite service (“MSS”) applications and well-suited for integration into a broad range of mobile devices. More specifically, MSSA seeks to advance global mobile connectivity via open, standards-based solutions.

MSSA welcomes the opportunity to provide the following additional views:

Question	Your response
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?	Confidential? –No MSSA takes no position on Ofcom’s proposed additional technical conditions.
Question 2: Do you have any comments relating to the proposed licence conditions?	Confidential? –No The proposed licence conditions lack a requirement for the Licensee to demonstrate through comprehensive technical analysis that its planned service does not cause harmful interference to current or future authorized IMT or MSS services. Absent this, potentially affected MNOs and SNOs are unable to assess potential interference, object to the proposed operations on that basis, and/or request that proposed operations be modified in advance, prior to authorization, or subjected to suitable conditions. This creates significant potential for

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	harmful interference and could lead to significant costs for each party after the fact. It also unfairly shifts costs and burdens onto affected MNOs, SNOs, and service providers—including costs and burdens associated with redressing such interference through a yet undefined process. Applicants seeking to enable D2D services from IMT spectrum should be required to submit for public review an analysis demonstrating how its proposed operations would not cause or contribute harmful interference to any authorized current or future terrestrial or non-terrestrial network, along with detailed engineering analysis clearly showing methodology and a clear description of and rationale for such methodology. Service providers should have an opportunity to review and comment on such analysis and submit additional analysis for Ofcom’s consideration (which could support conclusions other than those reached by the applicant). Such analysis would allow Ofcom to reach an informed decision as to whether the application should be granted or denied or granted subject to modifications to the planned operations or imposition of other conditions. MSSA also recommends Ofcom work closely with MNOs and SNOs to establish guidelines and principles for the assessment of interference – which would be made available to all potential applicants.
Question 3: Do you have any comments on our drafting of the Proposed Regulations? Please give reasons supported by evidence for your views.	Confidential? –No MSSA appreciates Ofcom’s recognition that D2D can be provided in MSS bands (“MSS D2D”) in addition to IMT spectrum (“IMT D2D”). As Ofcom has acknowledged, MSS D2D

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	is not in the scope for this consultation as there is an existing authorisation framework in place for these service¹. As MSSA has noted, MSS D2D does not raise the same interference risks as IMT D2D. MSSA further requests that Ofcom confirm that its consideration of D2D services in this consultation proceeding is limited to “direct connectivity between space stations and [IMT] user equipment to complete terrestrial IMT network coverage” only as currently being studied under WRC-27 AI 1.13 and Resolution 253 (WRC-23). Other “D2D” use cases involving terrestrial mobile operations could present additional or different concerns that would require further study before an appropriate licensing framework could be designed or implemented.
Question 4: Do you have any comments relating to any other matter in this Notice of Proposed Regulations?	Confidential? –No MSSA notes that there are ongoing CEPT/ITU studies, including under WRC-27 Agenda Item 1.13, which likely will help inform the standards and approaches to be taken with respect to IMT D2D operations on an international level. Agenda Item 1.13, in particular, addresses studies on potential new allocations or identifications for IMT, especially within mid-band spectrum that may overlap with or be adjacent to existing MSS and D2D bands. MSSA encourages Ofcom to facilitate international harmonization and affirm its commitment to CEPT and ITU processes by either delaying permanent regulations or by only moving forward with experimental licenses that are

¹ See Consultation: Enabling Satellite Direct to Device services in Mobile spectrum bands, Section 2.2, <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?v=402573>.

Question	Your response
	expressly subject to revision after WRC-27.

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