

Consultation response form

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? – Y / N Yes. OIC agrees with Ofcom’s approach to introduce additional technical conditions for D2D operation in the 2.6 GHz mobile band to protect air traffic control (ATC) primary surveillance radar in 2.7–2.9 GHz and other radars in the wider 2.7–3.1 GHz range. Aviation safety is paramount for island communities like Orkney, where air services are lifeline links. We support Ofcom’s plan to implement targeted protections alongside licence variation(s) and handset exemption regulations, aligned with the ambition to enable initial D2D services in early 2026. We specifically support and recommend: Stricter UE out-of-band emissions (OOBE) and aggregate limits for D2D uplink at 2.6 GHz, to protect nearby ATC radar receivers operating in 2.7–2.9 GHz. Limits should address aggregate interference from many handsets simultaneously visible to a low-elevation satellite, not only per-device emissions. These proposals should remain consistent with Ofcom’s established 2.6 GHz–radar coordination procedure and the CAA’s role as band manager for the 2.7–2.9 GHz PSR band.

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	Geographic coordination and dynamic controls (e.g., geofenced power reductions, duty-cycle management, or channel selection) around protected radar sites and approach/departure paths, taking account of Ofcom's Protected Radar list and any local operating constraints. Local test-and-verify pilots in Orkney (with HIAL/CAA oversight) before large-scale enablement, to validate models against real-world conditions (mixed sea/land clutter, low-altitude flights, short sectors). Publish measured results to inform final licence conditions and national rollout. These measures will minimise risk to ATC radar performance while allowing D2D to deliver early benefits in remote areas.
Question 2: Do you have any comments relaying to the proposed licence conditions?	Confidential? – Y / N OIC supports Ofcom's proposed non-technical licence conditions and suggests the following strengthening measures to maximise public value and resilience in island settings: <u>Shared Rural Network (SRN) additionality and outcome focus</u> Make explicit that D2D complements – and does not substitute for – the Shared Rural Network (SRN) obligations and terrestrial build. Require MNOs to report how D2D reduces outdoor geographic not-spots in places that are hardest to serve terrestrially, using metrics that can be compared with Connected Nations data.

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	<u>Service transparency & KPIs</u> Require publication of device support lists, expected service tiers (e.g., SOS-only vs. messaging vs. narrowband data), and performance KPIs such as message success rate and time-to-deliver under D2D fallback (noting D2D is initially outdoors/sky-view biased). This will manage expectations and build trust for rural consumers and visitors. <u>Emergency communications parity</u> Document how 999/112 and Advanced Mobile Location (AML) behave when a handset is on D2D, including any location-accuracy differences and mitigations (e.g., GNSS requirements). Given our reliance on maritime and aviation lifelines, clarity here is critical. <u>Interoperability for safety</u> Where feasible, encourage roaming/inter-op across different MNO–satellite partnerships so citizens are not stranded without D2D access purely due to their retail provider. This is particularly important for emergency scenarios in multi-operator not-spots. <u>Resilience liaison and exercising</u> Require each participating MNO to nominate a named resilience contact for Category-1 responders and local authorities, and to exercise D2D procedures annually with local resilience partnerships (storm seasons, ferry disruptions, mass events).

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	These additions align with Ofcom’s objectives to secure better outcomes and resilience while enabling innovation.
Question 3: Do you have any comments on our drafting of the Proposed Regulations? Please give reasons supported by evidence for your views.	Confidential? – Y / N Support with clarifications. OIC welcomes Ofcom’s intention to make exemption regulations under section 8 of the Wireless Telegraphy Act so that ordinary handsets and SIM-enabled devices can lawfully use D2D, alongside MNO licence variations. We suggest: Scope & timing clarity: Confirm the statutory instrument (SI) will list the specific frequencies only after at least one MNO’s relevant licence has been varied, so the SI can enter into force in step with the first live D2D service (Ofcom’s ambition is early 2026). Provide a clear amendment pathway for adding frequencies as further variations are approved. Device classes: State that the exemption covers mass-market handsets and other SIM-enabled UEs used for D2D, and highlight any class-specific constraints (e.g., power control, satellite waveform requirements). This helps retailers and consumers understand eligibility. Public-safety alignment: Reference how 999/112 and AML are expected to operate during D2D fallback and any transitional limitations, so emergency service partners can adapt workflows. Enforcement & updates: Outline how Ofcom will monitor compliance and update the SI where needed (e.g., to reflect changes in technical coordination requirements such as radar

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	protections) without undue delay to users and providers. These clarifications will make the regulations more predictable for implementers while preserving Ofcom’s flexibility to add frequencies/bands as D2D matures.
Question 4: Do you have any comments relating to any other matter in this Notice of Proposed Regulations?	Confidential? – Y / N Yes — OIC proposes the following additional considerations: Island-first operational pilots in Orkney (2025/26): Run structured pilots across selected islands and maritime corridors (e.g., ferry routes, fishing grounds) to validate coexistence with ATC radar, emergency call/AML workflows, user experience, and data-sharing for local authority planning. Publish results to inform national rollout and licence conditions. Equality and inclusion impacts: Consider the specific needs of island residents, older users, and low-income households. Where possible, ensure basic D2D safety messaging (e.g., SOS texts) is affordable/included in mainstream plans, given rural reliance on D2D as a fallback. Use Connected Nations and Scottish Islands evidence to benchmark progress in reducing not-spots. Aviation & maritime operational coordination: Maintain close coordination with CAA (PSR band manager for 2.7–2.9 GHz) and local air-

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	port operator HIAL/Kirkwall on radar protections and pilot activities; ensure maritime safety partners (Coastguard/RNLI) are engaged on emergency workflows. Monitoring and reporting: Encourage public reporting (e.g., dashboards) of D2D usage/availability and not-spot reduction at local authority granularity, to complement SRN monitoring and Ofcom's Connected Nations transparency. Together, these steps will accelerate benefits for rural communities while maintaining aviation safety, emergency readiness, and consumer confidence.

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