

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? – N Sateliot does not operate in the bands subject to the protection criteria so does not have strong sentiments either way on Ofcom's proposal. That said, we do support measures to protect radar systems and other sensitive systems tied to human safety.
Question 2: Do you have any comments relating to the proposed licence conditions?	Confidential? –N Condition 7 presents possible concerns as D2D services may be used for emergency communications, particularly when terrestrial infrastructure is damaged. Non-interference and non-protection may prove harmful in these situations. That said, we understand this may change following the outcomes of WRC-27 Agenda Item 13. In addition, we note that the 10° minimum elevation angle for satellite transmissions, as proposed in the draft licence variation schedule, could constrain coverage in certain service areas. We encourage Ofcom to retain some flexibility in this parameter to accommodate different satellite architectures and ensure optimal service continuity. We have no additional comments on the proposed licence conditions and support

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	Ofcom's proposal to adopt option 3 for the provision of D2D services within the United Kingdom.
Question 3: Do you have any comments on our drafting of the Proposed Regulations? Please give reasons supported by evidence for your views.	Confidential? – N We note that these regulations may require amendment following the results of WRC-27 AI 1.13. In this regard, Sateliot recommends that Ofcom adopt a future-proof approach by including all IMT bands in the 690 MHz–2.7 GHz range within the target frequency bands for complementary satellite-to-device services. This alignment with ongoing international discussions would ensure regulatory consistency and flexibility as global studies under Agenda Item 1.13 mature. We have no further comments on the proposed regulations and support their implementation.
Question 4: Do you have any comments relating to any other matter in this Notice of Proposed Regulations?	Confidential? – N We understand that the scope of these regulations is limited to D2D devices operating under the mobile service and pursuant to Art 4.4 of the ITU Radio Regulations. Sateliot is a D2D satellite operator providing connectivity to NB-IoT devices through the 3GPP Non-Terrestrial Network (NTN) standard (Release 17 onwards). We wish to express that deployment models such as ours should be duly considered by the Ofcom in future consultations. Many provisions of the current proposal could be adapted to NTN-based D2D systems, as such may still require partnership with local MNOs and device exemptions. However, we note that the proposed regulatory framework appears to assume a one-to-one partnership between a single MNO and a single satellite operator. This may not

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	reflect more competitive market configurations where multiple satellite operators could provide D2D connectivity within the same or adjacent spectrum portions. We therefore encourage Ofcom to consider non-exclusive partnership models to ensure fair competition, foster innovation, and avoid potential foreclosure effects in the D2D segment. Finally, we refer back to Sateliot's previous contribution to Ofcom's initial D2D consultation, where we underscored the importance of a technology-neutral and harmonised framework that supports both mobile-service-based D2D and MSS/NTN-based D2D implementations. Those priorities remain valid, and we continue to advocate for regulatory alignment that recognises the complementarity of IMT and MSS bands, as well as consistency in the treatment of user terminal exemptions across both domains.

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