

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
Question 2: Do you have any comments relating to the proposed licence conditions?	Confidential? – Y / N SpaceX urges Ofcom to reconsider the cross-border PFD coordination limits from Table 3.3 and instead adopt the existing limits in the UK's MOUs with neighbouring countries. Ofcom's urgent reconsideration of this proposed rule will protect the interest of UK citizens and communities who will benefit from current and future D2D services. [CONFIDENTIAL✕] Starlink Direct to Cell operations in countries with neighbouring terrestrial use of the spectrum, including in North America, Asia, Europe, and Latin America, clearly evidence that satellite operations using <i>established</i> cross-border emission limits for mobile operations in the band -- identical to those currently in place between the UK and its neighboring countries - are sufficient to protect cross-border spectrum users. In all cases, there have been no instances of harmful

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	interference to date resulting from Starlink Direct to cell operations. As border areas typically see lower rates of terrestrial coverage, it is essential for policymakers like Ofcom to maximize the coverage of potentially life-saving connectivity while ensuring that operations can occur without causing harmful interference. <u>Unfortunately, the current limits as proposed meet neither mandate, and are set so stringently, that consumers in Northern Ireland and the Southeastern UK will likely see little to no meaningful D2D services deployed unless Ofcom reconsiders the cross-border emission limits adopted.</u> Starlink D2C has indeed adopted mitigation techniques in order to meet cross-border limits, which has enabled its interference-free operation around the world. However, these mitigation techniques require Starlink and any other satellite D2D operator to taper power before reaching a border area including avoiding direct beam placement on a border cell. The intervening effect, due to a combination of the size of a single cell ranging between 50-100 kilometers and the particular contours of the UK's boundaries, is a sweeping impact that lasts several hundreds of kilometers. The impact to a consumer is further exacerbated when considering that satellite D2D relies on connecting a link from satellite beams from moving satellites several hundred kilometers above of a lower powered device on the ground. Put in another way, the impact of any amount of conservatism, scaling with each dB, results in thousands, if not millions, of citizens being denied access to potentially life-saving D2D services operating on UK sovereign spectrum licensed to its domestic mobile operators. SpaceX urges Ofcom to revert its current proposed cross-border PFDs in favor of the emission limits established in the UK's existing MOUs with adjacent countries. SpaceX also references the recent CEPT document from PTC25-067 for further technical evidence for Ofcom's consideration.

Question	Your response
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
Question 4: Do you have any comments relating to any other matter in this Notice of Proposed Regulations?	Confidential? – Y / N

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