

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? –N It is important that the envisaged licensing sets up geographical limits explicitly excluding EEZ. Offshore mobile operators should be consulted in case of any specific authorisation in offshore zone.
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 Yes, please see next page.
Question 4: Do you have any comments relating to any other matter in this Notice of Proposed Regulations?	Confidential? –N Yes, please see next page.

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

Consultation Response from Telenor Maritime

Telenor Maritime welcomes the opportunity to respond to Ofcom's consultation on enabling satellite direct-to-device (D2D/D2C) services.

1. Mobile communications using IMT spectrum in the Exclusive Economic Zone (EEZ) provide innovative and cost-effective services for both operational and emergency communications in the offshore industry. These services are critical for safety, connectivity, and efficiency in remote maritime environments.

2. It is essential that these offshore mobile services receive guaranteed, long-term protection from harmful interference, from MSS in particular. This applies to both co-channel and adjacent channel transmissions, as offshore networks often rely on sparse infrastructure and wide-area coverage.

3. Telenor Maritime recommends that stricter Power Flux Density (PFD) limits should be applied in the EEZ, where transmissions occur without clutter and existing mobile networks are more vulnerable to interference. These limits should be defined with sufficient granularity to ensure effective protection of offshore installations from MSS.

4. We encourage Ofcom to collaborate with other coastal states and enter into cross-border coordination agreements. Such cooperation is vital to ensure harmonised spectrum use and to mitigate interference risks in shared maritime regions.

We appreciate Ofcom's efforts to consult stakeholders and look forward to continued dialogue on this important topic.