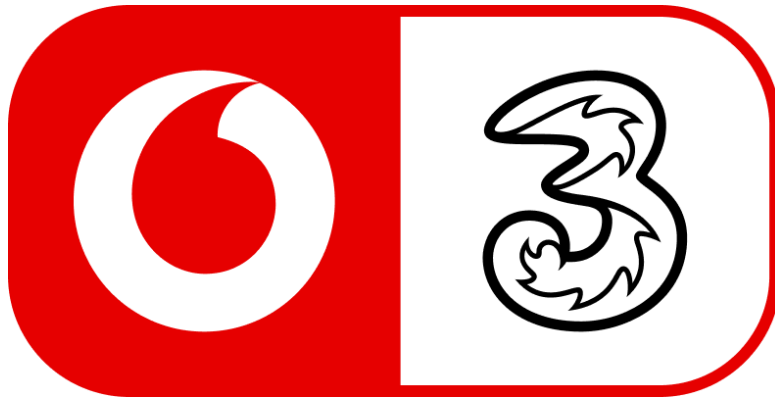
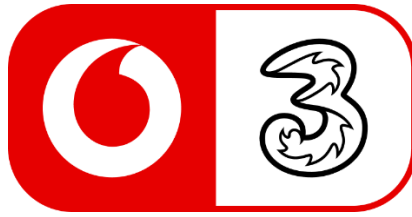




Response to Ofcom's Consultation:

Enabling satellite direct to device services in mobile spectrum bands

October 2025



Introducing VodafoneThree

At the beginning of June 2025, Vodafone UK and Three UK merged to become VodafoneThree. The merger signals the start of an exciting new chapter in UK communications, allowing citizens and consumers to benefit from a market leading new company that has the scale, resources and the innovative spirit to deliver game changing connectivity.

The merger signals not just a transition towards material enhancements in the UK's terrestrial mobile coverage, but it will create more opportunities such as the provision of D2D connectivity. VodafoneThree and our majority shareholder Vodafone plc operate satellite ground stations supporting both our own and third-party commercial operations.

To find out more about VodafoneThree, our brands and how we are building the United Kingdom's best network, visit: [Building the UK's Best Network | VodafoneThree](#)

Executive Summary

We welcome Ofcom's pioneering work in facilitating the nascent satellite direct-to-device (D2D) market. We continue to believe that with these proposals, Ofcom is striking the correct balance between protecting incumbent users and facilitating innovation that will provide profound public policy benefits.

Answers to Questions

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?

The proposals are consistent with the coordination requirements that already exist in our terrestrial 2.6GHz spectrum licences; we therefore support the proposal.

Question 2: Do you have any comments relating to the proposed licence conditions?

We support the principles behind the proposed licence conditions, and the proposed wording.

✂

Question 3: Do you have any comments on our drafting of the Proposed Regulations? Please give reasons supported by evidence for your views.

Question 4: Do you have any comments relating to any other matter in the Notice of Proposed Regulations?

We believe that the Proposed Regulations give effect to Ofcom's stated policy, so are supportive of them. We note that ✂ there is a possibility that the Notice will be dated 2026 rather than 2025 in the current draft.