


Consultation response form

Question	Your response
Question 1: Do you agree with our assessment of the business models that could potentially emerge?	Confidential? – Y / N No Response
Question 1(a): Are there any other business models that you think could deliver benefits for people and businesses in the UK?	Confidential? – Y / N No Response
Question 1(b): Are there any business models that could not operate under our proposed approaches?	Confidential? – Y / N No Response
Question 2: Do you agree with our assessment of the benefits that could be realised through authorisation of D2D services?	Confidential? – Y / N No Response
Question 2(a): Are there any other benefits for UK citizens and businesses that could be realised?	Confidential? – Y / N No Response
Question 3: Do you have comments on how emerging D2D technology should support 999 service provision?	Confidential? – Y / N No Response
Question 4: Are there any mobile spectrum bands not in scope of our proposals that you think we should consider?	Confidential? – Y / N No Response
Question 5: Does deployment in supplementary downlink spectrum (SDL) present any challenges in comparison to other bands? Is there interest in deploying in this spectrum?	Confidential? – Y / N No Response

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Question 6: Do you agree with our proposal to limit this authorisation to the UK main-land and territorial waters? If not, please explain why.	Confidential? – Y / N No Response
Question 7: Do you agree that our proposed technical conditions for D2D satellite emissions will protect mobile services delivered by other operators in adjacent areas and in adjacent spectrum?	Confidential? – Y / N No Response
Question 8: Do you agree with our high-level co-existence assessment for other services in adjacent spectrum to D2D?	Confidential? – Y / N There would be harmful interference from D2D services into deep space downlink S-band services (2200 – 2300 MHz) at Goonhilly. See response to Q9
Question 9: Are there other services co-channel or in adjacent spectrum that you think we should take into account when assessing coexistence? If so, please provide evidence of the nature of interference and what level of protection you consider is necessary.	Confidential? – Y / N A significant part of GES Ltd.'s business uses a 32 m earth station antenna at Goonhilly to downlink deep space services in S-band (2200-2300 MHz). This is the only UK asset capable of supporting such services. The proposed D2D services would operate only 30.3 MHz below this band.  Practical difficulties implementing filters, with a very steep cut-off, make it very difficult to reduce D2D levels to the point where they would not adversely affect the performance of our receive equipment. A D2D satellite, operating with a similar downlink power to a base station at the earth's surface, passing through the earth station antenna beam would give significantly higher levels of interference. Possible solution for consideration would be for D2D satellite beams to avoid using higher frequency blocks of mobile spectrum when

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	pointing towards the Lizard Peninsula in South-West England.
Question 10: Do you agree with our preferred authorisation approach (option 2)? If not, please set out your reasoning.	Confidential? – Y / N No Response
Question 11: Are there any alternative authorisation options, not discussed here, that you believe are worth considering?	Confidential? – Y / N No Response
Question 12: Do you agree with the proposed conditions?	Confidential? – Y / N No Response
Question 13: Do you have any other comments on the proposals set out in this document?	Confidential? – Y / N No Response

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