

Question	Your response
Question 1: Do you agree with our assessment of the business models that could potentially emerge?	No response
Question 1(a): Are there any other business models that you think could deliver benefits for people and businesses in the UK?	No response
Question 1(b): Are there any business models that could not operate under our proposed approaches?	No response
Question 2: Do you agree with our assessment of the benefits that could be realised through authorisation of D2D services?	No response
Question 2(a): Are there any other benefits for UK citizens and businesses that could be realised?	No response
Question 3: Do you have comments on how emerging D2D technology should support 999 service provision?	<p>Confidential? – N</p> <p>His Majesty's Coastguard (HMCG) is included in 999 service contacts and it is essential that any communications directed towards HMCG service indisputably comes from within UK territorial waters or the UK landmass (e.g., mountain rescue) in order to ensure that rescue resources and assets are deployed correctly and efficiently; also to ensure that misleading messages are detected and do not result in waste of resources such as helicopter deployment.</p>

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<p>Question 4: Are there any mobile spectrum bands not in scope of our proposals that you think we should consider?</p>	<p>Confidential? – N</p> <p>There will be band adjacency to L-band satcom frequencies and S-band radar. It should be noted that user smartphones will have to operate at full power, 23 dBm (200 mW), to reach the satellites, rather than the usual 2 dBm (1.6 mW) or -9 dBm (1/8 mW) to nearby cell towers. Aggregation of signals from multiple users could then become an issue.</p>
<p>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?</p>	<p>Confidential? – N</p> <p>The consultation on 1.4 GHz Authorisation was clear and precise on limiting use of the new 1.4 GHz services to SDL services. Any change to this anticipated spectrum use will call into question certain considerations on that consultation.</p>
<p>Question 6: Do you agree with our proposal to limit this authorisation to the UK mainland and territorial waters? If not, please explain why.</p>	<p>Confidential? – N</p> <p>Further to the response at Question 3, it is essential to limit use in this way, as HMCG service is one of the recipients of 999 emergency service calls for search and rescue operations in territorial waters and over rough/remote terrain inland (e.g., assisting mountain rescues). For such operations, it must be the case that location of such emergencies can be assumed to be within UK jurisdiction before activating rescue assets such as RNLI and helicopters unnecessarily or beyond UK responsibility on account of the costs involved and the risk posed to rescue personnel.</p>
<p>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?</p>	<p>Confidential? – N</p> <p>This should be the subject of studies conducted by ITU-R in preparation to WRC-27, with the assistance of IMO. MCA supports the collaborative work undertaken by ITU-R and IMO, especially in respect of any risks to safety-related communications and radionavigation and therefore cannot pre-judge the various issues that may become apparent during studies.</p>
<p>Question 8: Do you agree with our high-level co-existence assessment for other services in adjacent spectrum to D2D?</p>	<p>Confidential? – N</p> <p>As per the response to Question 7, the MCA cannot provide such an assurance in the absence of comprehensive studies at international level in relation to radiocommunication and radionavigation systems that may be adversely affected.</p>

Question	Your response
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.	<p>Confidential? – N</p> <p>Further to the responses to Question 7 and 8, the MCA considers that the situation should not be prejudged at this early stage, considering that there may well be legitimate questions to be studied in the appropriate fora (ITU, IMO and IEC) before reaching such a conclusion.</p>
Question 10: Do you agree with our preferred authorisation approach (option 2)? If not, please set out your reasoning.	<p>Confidential? – N</p> <p>MCA considers that it is far too early to come to easy conclusions at this time. The D2D concept exposes many novel questions on the coordination and use of frequencies and associated satellite orbits, as well as jurisdictional issues in relation to satellites, with a significant coverage footprint passing over land borders and intersecting territorial waters with no idea how frequency use will be constrained, such as to avoid overlap into adjacent and often multiply adjacent jurisdictions.</p>
Question 11: Are there any alternative authorisation options, not discussed here, that you believe are worth considering?	<p>No response</p>
Question 12: Do you agree with the proposed conditions?	<p>No response</p>
Question 13: Do you have any other comments on the proposals set out in this document?	<p>No response</p>

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