

Consultation response form

Question	Your response
Question 1: Do you agree with our assessment of the business models that could potentially emerge?	Confidential? – N Agree with your assessment of the business models that could potential evolve in the UK.
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
Question 1(b): Are there any business models that could not operate under our proposed approaches?	Confidential? – Y / N
Question 2: Do you agree with our assessment of the benefits that could be realised through authorisation of D2D services?	Confidential? – N Yes, we recognise the potential benefits, especially to users in rural locations. Especially the potential extending of voice, messaging, and data coverage beyond the reach of terrestrial networks, potentially enabling ubiquitous, outdoor coverage across 100% of the UK landmass as constellations roll out and technology matures. We would also welcome the provision of a degree of backup coverage during power outages or network faults which affect terrestrial base stations, in particular extreme weather. Thus, enhancing the resilience of mobile networks improving access to emergency '999' services as a result. Access to '999' services is all the more pertinent given that the PSTN network will be switched off by

Question	Your response
	<p>January 2027, therefore this potential extra resilience is very much welcome.</p> <p>We also recognise the possible benefit from the rollout of D2D services and consider that Ofcom's proposal could promote the interests of UK consumers, particularly those living in or visiting Orkney and using our coastal waters.</p> <p>However, we would hope that there would be a mechanism in whatever model is taken forward that ensures operators cannot charge premium prices to access D2D services for residents in rural areas like Orkney.</p>
<p>Question 2(a): Are there any other benefits for UK citizens and businesses that could be realised?</p>	<p>Confidential? – N</p> <p>Support for IoT and Smart Devices: D2D connectivity facilitates the integration of IoT devices, enabling applications like smart agriculture, smart tourism, connected vehicles, and remote monitoring in areas with limited infrastructure</p>
<p>Question 3: Do you have comments on how emerging D2D technology should support 999 service provision?</p>	<p>Confidential? – N</p> <p>It has been noted in the consultation document that improved access to 999 emergency services is a key potential benefit for UK citizens of the introduction of D2D services.</p> <p>However, we would hope that all efforts would be made to ensure that the manner in which D2D emergency coverage is provided, is</p>

Question	Your response
	done so without users in rural areas either losing access to 999 calls or being charged a premium for having such access.
Question 4: Are there any mobile spectrum bands not in scope of our proposals that you think we should consider?	Confidential? – N I am not technically qualified to answer that question.
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? – N I am not technically qualified to answer that question.
Question 6: Do you agree with our proposal to limit this authorisation to the UK mainland and territorial waters? If not, please explain why.	Confidential? – N Yes
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? – N Mostly, we would expect that all action to be taken to mitigate the risk of interference with the MNOs terrestrial network from their partnering Satellite Operators transmitting into the same location in the UK on the same frequencies. We would expect Ofcom to outline the technical conditions needed to ensure safe use of other spectrum in adjacent bands. The conservative approach proposed by Ofcom in the consultation document in section 4.34 is prudent. Especially given the uncertainty about the unwanted emissions of D2D satellite transmissions and future D2D satellite transmissions may use a bandwidth of greater than 5 MHz.

Question	Your response
<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>I am not technically qualified to answer that question.</p>
<p>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>	<p>Confidential? – N</p> <p>I am not technically qualified to answer that question.</p>
<p>Question 10: Do you agree with our preferred authorisation approach (option 2)? If not, please set out your reasoning.</p>	<p>Confidential? – N</p> <p>Yes, we agree that the preferred authorisation approach (option 2) set out in the consultation document is appropriate.</p> <p>As the MNO, through its commercial contract, could require the Satellite Operator to comply with the relevant conditions. Hopefully, this would provide sufficient certainty that the Satellite Operator will take timely and effective action to address interference.</p>
<p>Question 11: Are there any alternative authorisation options, not discussed here, that you believe are worth considering?</p>	<p>Confidential? – N</p> <p>I am not technically qualified to answer that question.</p>
<p>Question 12: Do you agree with the proposed conditions?</p>	<p>Confidential? – N</p> <p>Yes, as long as the D2D operators to inform Ofcom about which of the MNO's licensed bands it intends to utilise to provide D2D services. Our primary concern is that users in rural areas such as Orkney are not penalised in</p>

Question	Your response
	<p>anyway in terms of pricing or range of services offered.</p>
<p>Question 13: Do you have any other comments on the proposals set out in this document?</p>	<p>Confidential? – N</p> <p>Orkney is just within the longitude range for D2D services. We would hope that all effort would be made to ensure that our residents could access this connectivity solution.</p>

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