

# Consultation response form

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<b>Consultation title</b>	Ofcom's proposed Plan of Work
<b>Full name</b>	[X]
<b>Contact phone number</b>	[X]
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	Eutelsat Group
<b>Email address</b>	[X]

## Your response

### Background

1. Eutelsat Group was formed in September 2023 through the combination of Eutelsat, a global GEO satellite operator, and LEO constellation operator OneWeb – creating one of the world's most innovative and experienced commercial satellite operators. The company is headquartered in Paris, with the centre of its Low Earth Orbit (LEO) operations based in London.
2. With a fleet of 37 geostationary satellites and a LEO constellation of more than 600 satellites providing capacity for broadcasters, media service providers, telecom operators, ISPs and governmental agencies, Eutelsat Group is the world's first satellite operator with an integrated GEO-LEO infrastructure. Our satellites are used for video broadcasting, satellite newsgathering, broadband services, data connectivity, connecting aviation and maritime, and enabling mission-critical government and NGO communications.

Question	Your response
<b>Question 1: Do you have any comments on Ofcom's proposed Plan of Work 2024/25?</b>	Confidential? – N

Eutelsat Group welcomes the opportunity to provide comments on Ofcom's proposed plan of work for 2024/2025. We are committed to supporting Ofcom in achieving its identified outcome of '*Enabling wireless services in the wider economy*', and the implementation of Ofcom's Space Spectrum Strategy to expand opportunities for satellite communications and other space-based services in the UK.

The satellite industry needs long-term certainty regarding access to harmonised spectrum to ensure the necessary investment and continued development of existing and new satellite capabilities. It is therefore essential that Ofcom's policy and approach ensures spectrum in which the satellite industry is currently operating - and looking to provide future services - is adequately protected from other spectrum users.

This commitment to safeguarding the satellite industry's spectrum and making more spectrum available to enable innovative satellite applications should be a foundational element in the implementation of Ofcom's work plan, aligning with its recent Space Spectrum Strategy.

#### Spectrum Sharing (3.8-4.2 GHz)

As in our response to Ofcom's recent consultation on spectrum sharing in the 3.8-4.2 GHz band, we ask that Ofcom remains mindful of what new modifications could imply for incumbent users. We recommend that Ofcom wait until CEPT's current harmonisation work with respect to the 3.8-4.2 GHz band has been completed and finalised before introducing any new technical criteria.

It is of utmost importance that Ofcom ensures the protection and future evolution of satellite services in this band and that Ofcom carefully monitors the implementation of any new measures to ensure actual and real coexistence.

#### Ku band

Eutelsat Group was heartened by Ofcom's changes to use of 14.25-14.5 GHz, to enable aeronautical earth stations in motion (ESIMs) in this frequency band. Opening this spectrum is critical to enabling NGSO services to operate successfully in the United Kingdom.

Similarly, as Ofcom looks to the future and enabling even more intensive NGSO use of Ku band spectrum, including additional entrants, it will be critical to look at how satellite systems can be accommodated in additional Ku band spectrum.

In that regard, Eutelsat Group notes that WRC-27 will consider use of smaller earth stations in the 13.75-14 GHz band. Currently, GSO systems are limited to earth stations 1.2 meters in diameter or larger, while NGSO systems are limited to 4.5 meters in diameter or larger. While Eutelsat Group recognises that there are important government uses of this spectrum, reviewing conditions established more than 20 years ago to enable deployment of modern satellite applications through consideration of relevance of such size limitation, but if needed framed by other conditions to protect other systems, would be a significant step in enabling more efficient use of this valuable, contiguous spectrum to the already heavily used 14-14.5 GHz uplink band.

Eutelsat Group urges Ofcom to seriously look at the feasibility of increased sharing in the 13.75-14 GHz frequency band.

#### mmWave

Ofcom has announced plans to award mmWave spectrum for mobile use. Eutelsat Group would like to underline that any authorisation framework allowing for the use of the 26GHz and 40GHz bands for the development of terrestrial mobile networks shall make sure that existing and planned satellite broadband services are sufficiently protected from harmful interference.

Ofcom should implement the technical requirements agreed at the international and regional level and make sure that any applicable license conditions enable sharing with FSS earth stations.

### Q/V Band

Q/V bands are key for the future of satellite services; Q/V bands plays a critical role in enabling feeder links for the next generation of high and very high throughput satellite systems, and for user terminals in a later step.

We have started - and are intending to use extensively - the FSS allocation in Q/V band (between 37.5 to 52.4 GHz) for feeder links for future generations of gateways. Any new approach to licensing gateway earth stations in the Q/V band should be based on ensuring access to substantial, contiguous spectrum particularly in the uplink direction for operation of commercial satellite services in the UK.

In addition, we would like to note that WRC-27 Agenda Item 1.3 decided to study the use of the frequency band 51.4-52.4 GHz to enable use by gateway earth stations transmitting to non-geostationary-satellite orbit systems in the fixed-satellite service (Earth-to-space). Eutelsat Group has intention to implement this band in our future NGSO gateways. Allowing NGSO gateways in addition to GSO gateways will improve the efficient use of this spectrum.

### Telecoms Security Act (UK TSA)

In a context of increased risk and threats, Eutelsat Group welcomes the UK legislative initiative to enhance the security of telecom infrastructures. However, as a satellite operator, we would like to emphasise the specific nature of satellite networks which complicate the implementation of these measures. Indeed, space systems present a rather complex architecture (space segment, ground segment, link segment, user segments) creating specific challenges. In the context of the UK TSA, for instance, Eutelsat S.A., which is registered as a public electronic communications network provider in the United Kingdom and subject to the Code of Practice measures, does not own any infrastructure within British territory (i.e., infrastructures located in space, Italy, France).

Moreover, Eutelsat Group is a worldwide company providing electronic communications networks and services to numerous countries. As such, it is subject to multiple national cybersecurity regulations, with requirements often redundant from one country to another (IA-PRE in the US, NIS and CER directives in the EU, ISO 27001, etc.). Ensuring compliance with these frameworks is highly complex, costly and can hamper market access while the company already meets widely recognised high security standards. International companies would greatly benefit from the implementation of a mutual recognition principle with regards to standards, that would link the UK and other key big size markets such as the EU.

### Rural and Remote Areas

Eutelsat Group continues to partner with DSIT on their Alpha Trials, utilising LEO satellite broadband technology to connect Very Hard to Reach Premises. As part of these trials, our services have been deployed at Papa Stour and Lundy Island.

We would be delighted to work with Ofcom in support of their efforts to raise awareness and facilitate access to LEO satellite services to help connect rural communities across England, Scotland, Wales and Northern Ireland – as noted in Section 3 (para. 3.16).

Overall, we applaud Ofcom's continuing recognition of the importance of satellites in providing global connectivity and broadband services to consumers and businesses in the UK and in revolutionising network infrastructure. Eutelsat Group commends Ofcom's commitment to review and update its current spectrum policies to expand opportunities for satellite communications by ensuring certainty and flexibility, as well as to strengthen its international partnerships towards better harmonisation and adoption of technical standards for efficient spectrum use.

On a last note, we support Ofcom's efforts to simplify current licensing processes and improve access to spectrum information for all users and welcome the adoption of a more streamlined and automated licensing approach that is fit for purpose and flexible enough to accommodate future changes and technological advancements in the satellite sector. It is important that Ofcom continue assessing evolving business needs and updating their policies as required.