

## Your response

Question	Your response
<p><b>Question 1:</b> Do you have any comments on Ofcom's proposed Work Plan for 2025/26?</p>	<p>Confidential? –N</p> <p>Viasat appreciates the opportunity to provide its comments on Ofcom’s proposed Plan of Work for 2025/26<sup>1</sup>. In particular, Viasat provides its comments on the proposed work supporting delivery of the “Enabling wireless in the UK economy” goal.</p> <p>Viasat supports Ofcom’s proposals to carry out work related to:</p> <ul style="list-style-type: none"> <li>- “Expanding spectrum access for satellite gateways” in Q/V and E bands;</li> <li>- “Expanding spectrum access for aeronautical and maritime satellite connectivity” in Ka and Ku bands; and</li> <li>- “Regulatory framework for direct satellite to mobile handset connectivity”.</li> </ul> <p>While expanding spectrum access for satellite gateways in Q/V and E band is welcome, Viasat also recommends that Ofcom address inadequacies in the existing framework for protection of geostationary (“GSO”) networks from non-geostationary (“NGSO”) systems in Q/V bands and create a new technical framework for the same in E band. Viasat notes that some technical and regulatory issues related to the work listed above are at an early stage of study in the ITU and CEPT. For example, studies under World Radiocommunication Conference 2027 (“WRC-27”) Agenda Items (“AIs”) 1.1, 1.3 and 1.6 may result in a need to update the existing CEPT framework for Q/V bands. Viasat has submitted studies and information in ITU Working Party 4A that demonstrates the inadequacy of the existing regulatory and technical framework for protection of GSO networks from NGSO systems, including Earth Stations in Motion (ESIMs), in these bands. PFD limits for protection of terrestrial services from space services in E-band are also being studied under WRC-27 AI 1.10. Direct-to-device applications in IMT spectrum are also being studied under WRC-27 AI 1.13. Ofcom may need to</p>

<sup>1</sup> See Ofcom Consultation: Ofcom's Plan of Work 2025/26, here <https://www.ofcom.org.uk/about-ofcom/annual-reports-and-plans/consultation-ofcoms-plan-of-work-202526/>.

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	<p>accommodate revisions to the UK framework on these matters (<i>i.e.</i>, gateways in Q/V/E and direct-to-device services in IMT spectrum) if Ofcom decides to pre-empt the ITU's framework through a domestic regime implemented before 2027. Should Ofcom plan to develop a national regulation that goes beyond the existing CEPT and ITU regulatory provisions (<i>i.e.</i>, CEPT ECC Decisions and the ITU Radio Regulations), Viasat urges Ofcom to make available the necessary technical and operational characteristics of satellite systems and networks which are planned to be used under UK national regulation in order to understand how sharing and coexistence will be managed with other existing and planned services in the same and adjacent bands.</p> <p>Viasat supports work related to “<i>Updating our satellite authorisation framework</i>” which includes review of the NGSO licensing framework (introduced in 2021) and the satellite gateway license fee policy as well. As Viasat has outlined to Ofcom previously<sup>2</sup>, the difference in the approach for calculating fees for NGSO systems and GSO networks gateways leads to a competitive advantage for NGSO operators relative to GSO operators. For this reason and taking into account the fact that spectrum access for other NGSO systems is at risk, Viasat supports a comprehensive review of Ofcom’s satellite licensing framework for NGSO systems in order to address the rapidly increasing challenges of sharing spectrum and orbital resources <i>between</i> NGSO systems. Existing procedures rely heavily on potential actions that Ofcom could take in the event of interference. Such approach puts existing services at risk and creates regulatory uncertainty for satellite operators intending to provide services in the UK. Focus must be put on specific sharing conditions that are needed at the licensing/market access stage to avoid interference in the first place. Viasat also supports an update of Ofcom’s <i>Procedures for Management of Satellite Filings</i>, implementing WRC-19 and WRC-23 decisions.</p>

<sup>2</sup> See Viasat response to Ofcom Statement and consultation: *Increasing use of the 27.5 – 30 GHz band*, here <https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-2-6-weeks/281322-increasing-use-of-the-27.5—30-ghz-band/responses/viasat.pdf?v=373931>.

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	<p>Finally, Ofcom notes that, among other projects, it will auction additional spectrum in the 1.4 GHz (1427-1517 MHz) band for mobile use. As previously stated in its January 2024 comments on Ofcom’s 1.4 GHz band proposal, Viasat emphasizes the need to establish effective protection measures for aeronautical, maritime, and land-based mobile satellite service (“MSS”) terminals before auctioning the band for IMT.</p> <p>To this end, Viasat recommends refraining from auctioning spectrum above 1492 MHz because any use of the band 1492-1518 MHz by terrestrial mobile systems will require the implementation of complex compatibility measures to protect Viasat’s current and planned MSS operations in the United Kingdom. Viasat recommends reviewing its January 2024 comments, which include several sections on additional compatibility measures that would protect land, maritime, and aeronautical MSS services from experiencing harmful interference due to IMT deployments in the adjacent 1.4 GHz band.</p>
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