

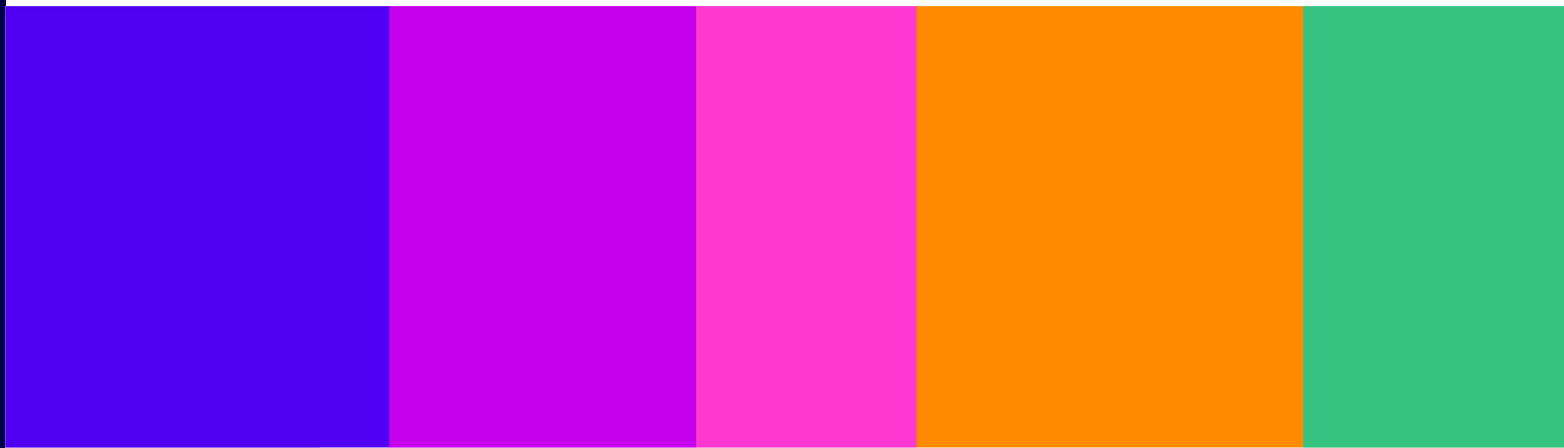
Amazon Kuiper UK Limited application for a non- geostationary gateway earth station licence

Request for comments

Consultation

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Contents

Section

1. Overview	3
2. Introduction and background	4
3. Assessing the impact on NGSO coexistence	8
4. Assessing the impact on competition	11
5. Additional comments and impact assessments	14
6. Our proposals and next steps	15

Annex

A1. Impact assessments.....	17
A2. Responding to this consultation	19
A3. Ofcom's consultation principles	21
A4. Consultation coversheet.....	22
A5. Consultation questions	23

1. Overview

- 1.1 Non-geostationary orbit (NGSO) satellite systems are a way of delivering broadband services from space using a constellation of satellites, usually in a low or medium earth orbit. They have the potential to deliver higher speeds and lower latency services to consumers, customers and citizens.
- 1.2 We received a completed application from Amazon Kuiper UK Limited (Kuiper) for a satellite non-geostationary earth station licence (an NGSO gateway licence) in the UK in June 2025. This licence would authorise Kuiper to operate an NGSO gateway earth station in the Ka band in Bude, Cornwall, to connect to its planned NGSO satellite transmission system (also known as Kuiper). This gateway would support Kuiper's plans to provide high speed, low latency wireless broadband services from satellites to households, businesses and other customers in the UK, as well as backhaul connectivity to telecommunications carriers.

What we are proposing – in brief

This document sets out our initial assessment of Kuiper's application for an NGSO gateway licence for its Kuiper system using Ka band frequencies between 27.5-27.9505 GHz, 28.4445-28.9585 GHz and 29.4525-30 GHz. Kuiper plans to provide satellite connectivity services to households, businesses and other customers in the UK.

Our preliminary view is that we will grant an NGSO gateway licence to Kuiper, having considered the technical coexistence and competition impacts of its NGSO system on existing and future NGSO systems.

We invite comments on Kuiper's NGSO licence application and our preliminary views, as set out in this consultation, by 29 July 2025. Details of Kuiper's NGSO licence application can be found under the "Applications received" section of our [NGSO licensing webpage](#).

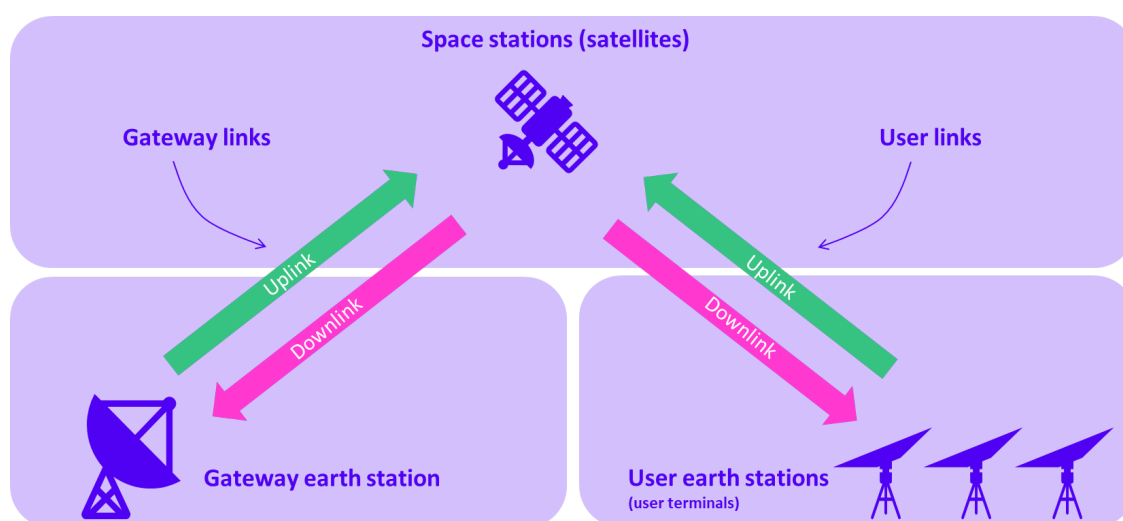
We will consider any responses to this consultation before reaching a final decision on whether to grant Kuiper an NGSO gateway licence to operate in Ka band frequencies 27.5-27.9505 GHz, 28.4445-28.9585 GHz and 29.4525-30 GHz.

The overview section in this document is a simplified high-level summary only. Our decision and reasoning are set out in the full document.

2. Introduction and background

- 2.1 Our NGSO licensing process for considering applications for NGSO spectrum licences aims to enable citizen and consumer benefits such as improved connectivity. It was designed to encourage greater cooperation between NGSO licensees, enhance our ability to intervene if harmful interference arises, safeguard competition, and ensure greater transparency through a short consultation process. Our approach to NGSO licensing is set out in our [2021 statement on licensing NGSO satellite systems](#) (the 2021 NGSO statement), and [guidance for NGSO applicants on the licensing process](#).
- 2.2 Our NGSO licensing process covers two types of NGSO licences:
- *Satellite (earth station network) licence* - for NGSO use: authorises an unlimited number of user terminals, for example a satellite dish, to connect to the NGSO satellite system (the NGSO network licence).
 - *Satellite (non-geostationary earth station) licence*: authorises gateway earth stations connecting the NGSO satellite system to the internet or private network (the NGSO gateway licence).
- 2.3 This consultation relates to the second of these licences: an **NGSO gateway licence**.
- 2.4 The NGSO gateway licence covers UK earth station hubs connecting an NGSO satellite system to the internet and/or private networks or cloud services. Figure 1 illustrates the key elements of an NGSO system. We require the holder of the NGSO gateway licence to have control over the gateway earth station (so it is typically held by a satellite or teleport operator), and to only operate gateway(s) in connection with a licensed NGSO system under an NGSO network licence. It also places other conditions on licensees, including that gateway(s) must become operational within 12 months of the licence being granted, and managing the gateway to prevent harmful interference (see condition 5 “Additional conditions”). All NGSO licences are listed in the “Existing licences” section of our [NGSO licensing webpage](#).

Figure 1: Key elements of an NGSO satellite system



Kuiper's application and proposed NGSO gateway

- 2.5 We received a completed application from Amazon Kuiper UK Limited (an affiliate of Kuiper Systems LLC, referred to in this document as 'Kuiper') on 12 June 2025 for an NGSO gateway licence to operate a gateway earth station in Bude, Cornwall, UK. This gateway earth station will connect to its first generation (Gen1) NGSO constellation, also known as 'Kuiper'. [We authorised Kuiper to operate terminals in the UK](#) under its [NGSO network licence](#), issued on 18 February 2025¹.
- 2.6 Kuiper indicates that its NGSO constellation will operate in accordance with the satellite filings for its Gen1 NGSO system², with the following references: USASAT-NGSO-8A, USASAT-NGSO-8B, and USASAT-NGSO-8C, and has requested to use Ka band frequencies 27.5-27.9505 GHz, 28.4445-28.9585 GHz and 29.4525-30 GHz³ for this NGSO gateway.
- 2.7 In its NGSO gateway licence application, Kuiper states that this gateway would support its plans to provide high speed, low latency wireless broadband services from satellites to a variety of retail and wholesale customers in the UK including individual households, schools, hospitals, government offices, businesses of all sizes, first responders and disaster relief operations. It also intends to provide backhaul connectivity to telecommunications carriers. Kuiper plans to offer these services throughout the UK,⁴ and expects more than 75% of its customers will be located outside the southeast of England, including in Wales, Scotland and Northern Ireland.
- 2.8 Globally, Kuiper plans for its gateway earth stations to be distributed throughout its NGSO system's service area, such that each Kuiper satellite can ideally access two different gateway earth stations at a time.
- 2.9 Further information about Kuiper's NGSO gateway licence application can be found on our [NGSO licensing webpage](#) (reference: KUIPER-GAT-1).

Other NGSO licensees in the UK

- 2.10 We expect applicants to show they are able to operate alongside existing NGSO licensees. At the time of writing, there are eight NGSO network licensees in the UK, which permit satellite operators to transmit in the Ku band (14.0-14.5 GHz) and/or Ka band (27.5-27.9405 GHz, 28.4545-28.9485 GHz, and 29.5-30 GHz). Below, table 1 indicates which of these frequency bands licensees applied to use to connect user terminals to their NGSO constellations (licensees operating in Ka band are likely to be using the same frequencies as Kuiper and are therefore more relevant to assessing coexistence; Kuiper's system is unlikely

¹ The NGSO network licence is licensed to Amazon Kuiper Services Europe SARL. Both Amazon Kuiper Services Europe SARL and the applicant for this NGSO gateway licence, Amazon Kuiper UK Limited, are wholly owned subsidiaries of Amazon.com, Inc.

² Kuiper's second generation NGSO system will operate under the following satellite filing references: KBSAT-NGSO-P-R, USASAT-NGSO-8E and USASAT-NGSO-8F. Kuiper states that none of these filings are in use with this application for an NGSO gateway licence in Cornwall.

³ These relate to Kuiper's proposed uplink frequencies. Kuiper's application also indicates its proposed downlink frequencies will be 17.7-18.6 GHz and 18.8-20.2 GHz.

⁴ Kuiper states that the coverage limit of its Gen 1 NGSO system is 56 degrees latitude north (which we note crosses Scotland at Falkirk and the Firth of Forth), and that it plans to cover latitudes above 56 degrees in future generations of its NGSO system.

to cause harmful interference to Ku band licensees because there is no frequency overlap). We currently have no NGSO network applications underway in the UK.

Table 1: Existing NGSO network licensees and terminal frequency bands

NGSO network licensees	Terminal frequency band
Kepler Communications Inc. (Kepler)	Ku band
Amazon Kuiper Services Europe SARL	Ka band
Mangata Edge Ltd (Mangata)	Ka band
Telesat LEO Inc (Telesat)	Ka band
Rivada Space Networks GmbH (Rivada)	Ka band
NSLComm Ltd (NSLComm)	Ka band
Starlink Internet Services Limited (a subsidiary of SpaceX) (Starlink)	Ku band
Network Access Associates Ltd (a subsidiary of Eutelsat OneWeb)	Ku band

2.11 In addition, there are seven NGSO gateway earth stations in the UK which all connect to the Starlink NGSO constellation, as shown in table 2. Each NGSO gateway is individually licensed to operate in the Ka band, although some licences are held by teleport/site operators rather than Starlink itself. NGSO gateways in the Ka band are permitted to operate across a wider range of frequencies than user terminals in the UK.⁵ When assessing whether Kuiper’s NGSO gateway can coexist with NGSO systems in this consultation, we only consider the frequencies shared by both gateways and user terminals (i.e. those listed in paragraph 2.10). There are currently no other NGSO gateway applicants in the UK.

Table 2: Existing NGSO gateway licensees, their locations and frequency bands

NGSO gateway licensees	Location	Gateway frequency band
Starlink Internet Services Limited	Fawley	Ka band
Starlink Internet Services Limited	Morn Hill	Ka band
Starlink Internet Services Limited	Wherstead	Ka band
Starlink Internet Services Limited	Woodwalton	Ka band
Starlink Internet Services UK Limited	Isle of Man	Ka band
Arqiva Ltd	Chalfont	Ka band
Goonhilly Earth Station Limited	Goonhilly	Ka band

2.12 These NGSO licences can be found under the “Existing licences” section on our [NGSO licensing webpage](#).

⁵ There are no NGSO gateways currently operating in the Ku band in the UK.

Structure of this document

2.13 The rest of this document is structured as follows:

- Section 3 assesses Kuiper's NGSO licence application, including the capability of its NGSO gateway to coexist with other (current and future) NGSO systems;
- Section 4 assesses the potential competition risks and benefits that may arise from Kuiper's NGSO licence application;
- Section 5 covers any other comments, as well as summarising our equality and Welsh language impact assessments;
- Section 6 summarises our proposals and next steps;
- Annex 1 sets out our impact assessments, including on equality and the Welsh language;
- Annexes 2 and 3 explain how to respond to this consultation, and set out our consultation principles respectively; and
- Annexes 4 and 5 set out the consultation coversheet and list of consultation questions.

3. Assessing the impact on NGSO coexistence

- 3.1 Our [2022 Space Spectrum Strategy](#) sets out our aspiration to enable as many NGSO systems as possible, to provide services and increase choice for citizens and consumers in the UK. NGSO satellites are dynamic by nature, creating a complex spectrum management environment, both in space and on the ground. We recognise the importance of ensuring that different NGSO systems are able to operate alongside each other without increasing the risk of harmful interference, and this is one of the aims of our NGSO licensing process.
- 3.2 The International Telecommunication Union (ITU) Radio Regulations mandate that NGSO satellite operators establish coordination agreements to prevent harmful interference. An order of precedence is assigned to a satellite system or network based on its satellite filing submission date, and operators must seek an agreement with operators of earlier filed systems and networks. Ultimately, the notifying administration responsible for holding the satellite filing is responsible for ensuring that operators comply with these ITU obligations.

Coexistence with existing NGSO systems

- 3.3 When applying for an NGSO gateway licence, we ask applicants to demonstrate how coexistence is possible between their NGSO gateway and other NGSO systems or gateways already licensed in the UK (as well as any NGSO licence applicant's systems or gateways) that plan to operate in the same frequency band(s). Applicants should also show how they are able to coexist with other specific co-frequency earth stations registered with the ITU⁶.
- 3.4 We summarise the current NGSO licensees in tables 1 and 2 respectively above.

Our initial view

- 3.5 We have considered the information provided by Kuiper in its NGSO gateway application:
- a) Kuiper Systems LLC already has an ITU coordination agreement in place with one UK NGSO licensee (Telesat).
 - b) We have reviewed the technical coexistence analysis Kuiper provided for NSLComm, Mangata and Rivada's NGSO systems and Starlink's NGSO gateways.
 - c) Kuiper states there is no frequency overlap with Kepler and Eutelsat OneWeb's NGSO systems, and that Eutelsat OneWeb is not operating any Ka band gateways in the UK. Kuiper has not provided coexistence analysis for these two licensees since these systems are able to coexist.
- 3.6 From the evidence provided, our preliminary view is that Kuiper's proposed NGSO gateway and these NGSO systems and gateway earth stations should be able to coexist. This is because, even under the conservative assumptions adopted by Kuiper in its coexistence

⁶ These are listed at the bottom of our [NGSO licensing webpage](#).

analysis, its NGSO gateway will have a minimal impact on existing NGSO network and NGSO gateway licensees.

3.7 We reiterate that all parties should continue coordinating in good faith, noting that our NGSO network licence conditions require licensees (including Kuiper⁷) to cooperate with each other so they can coexist.

3.8 We invite stakeholders to respond to the following question:

Consultation question 1:

Do you anticipate this NGSO gateway earth station will pose coexistence challenges to existing NGSO systems?

Coexistence with future NGSO systems

3.9 Our process for considering NGSO gateway licence applications recognises that it is not possible for an applicant to know the future plans of other operators. An applicant's proposed approach to coexistence cannot therefore be detailed and specific at this stage.

3.10 In summary, we request applicants to set out clear principles for appropriately mitigating interference issues, to demonstrate that their NGSO system (including any gateways) has the flexibility to accommodate new entrants, if required. This will ensure they can meet the terms of their licence if and when additional NGSO operators apply to operate services in the UK. We therefore require applicants to:

- explain how their existing network design and operating model might facilitate coexistence with future NGSO systems, as well as any limitations;
- outline any additional measures for improving coexistence with future NGSO systems and their expected benefits; and
- take reasonable measures to accommodate future NGSO systems, in order to avoid material degradation to services in the UK, as well as specifying the measures future NGSO systems could reasonably be expected to put in place to coexist with NGSO terminals and/or gateways.

3.11 Kuiper states in its NGSO licence application that it will coordinate with any future NGSO system, but to demonstrate it will also be able to achieve compatibility, it explains it has designed its NGSO system with a number of flexible techniques, including:

- sophisticated frequency and beam planning algorithms;
- coding and modulation techniques; and
- use of redundant communication paths for unforeseen outages or interference.

3.12 Kuiper also notes that its NGSO system uses narrow beamwidths to ensure that energy transmitted is only received in areas near the intended receiver. As a result, other unintended receivers observe significantly reduced levels of interference, allowing other

⁷ As noted in footnote 1, the NGSO network licence is held by Amazon Kuiper Services Europe SARL which, like the applicant, is a wholly owned subsidiary of Amazon.com, Inc.

NGSO systems to use co-frequency spectrum in the same locations. Further, Kuiper's planning software has been designed so that it can specifically target areas for:

- frequency stay-out zones⁸;
- satellite avoidance angles; or
- power reductions.

Our initial view

3.13 Our initial view is that, having reviewed the information submitted by Kuiper in its [NGSO gateway application](#), the techniques described for flexibly accommodating new entrants should be sufficient to ensure its NGSO gateway will be capable of coexisting with future NGSO systems (including gateways and terminal operators).

3.14 We invite comments from stakeholders on the following question:

Consultation question 2

Are the measures set out by the applicant to enable coexistence with future NGSO systems reasonable?

⁸ We understand Kuiper's frequency stay out zones refer to its capability to impose frequency constraints at a planning cell level of resolution, and could be created in a localised area (over a selected number of planning cells) to avoid potential interference in specific frequency channels. Kuiper also states it will have geofencing capabilities to restrict the availability of service offerings to terminals based on their reported position.

4. Assessing the impact on competition

- 4.1 Our NGSO licensing process explains that our starting position for assessing competition is to authorise applications where possible. This reflects the extent of the likely risks to competition, and our view that, because the NGSO industry is still emerging and characterised by uncertainty, the benefits of enabling systems is in general likely to exceed the risks.

Risks to competition

- 4.2 We have identified five potential risks to competition that could be relevant to our assessment of Kuiper's application for an NGSO gateway licence. These concerns relate to scarcity, i.e. the availability of gateway sites to future applicants, and coexistence with other NGSO operators. If realised, these concerns could lead to weakened competition and worse outcomes for consumers, such as higher prices or lower quality of services. We also note that some of the key competition risks in the satellite sector are global in nature and are not necessarily affected by Ofcom's gateway licensing decisions. We give our preliminary view on each below.⁹

Potential risk 1: Occupying all or most of the available NGSO gateway sites, or occupying preferential sites, raising the cost of entry to subsequent entrants

- 4.3 Kuiper has applied to operate at one gateway site in Cornwall, using a small number of antennas. Therefore, our view is that potential risk 1 is unlikely to materialise, because there are alternative, comparable sites for other satellite operators to develop, should they wish.

Potential risk 2: Requiring large separation distances between its NGSO gateway(s) and gateways or user terminals of other operators, thereby sterilising areas for existing and future rivals

- 4.4 The coexistence analysis provided by Kuiper indicates that, even when its gateway is co-located with other operator's gateways and/or user terminals, existing licensees' decreased availability and reduction in throughput would be modest. Therefore, our preliminary view is that Kuiper would not sterilise large areas for existing and future rivals, and so potential risk 2 is unlikely to materialise.

⁹ As noted in our February 2025 [Statement: Amazon Kuiper Services Europe SARL application for a non-geostationary earth station network licence](#) (see paragraph 5.18), Kuiper is a separate entity to Blue Origin Enterprises, L.P. (Blue Origin) – an aerospace manufacturer and spaceflight services company, which is active in rocket launches. This means that these two companies are not vertically integrated. Therefore, in this consultation we do not examine vertical theories of harm, such as input foreclosure. Even if the two firms were vertically integrated, Blue Origin does not yet have a significant presence in the satellite launch market, which explains our decision not to consider this theory of harm at this stage.

Potential risk 3: Applying for NGSO gateway licences at sites which it does not plan to develop to deliberately block future entrants

- 4.5 As per our 2021 NGSO licensing statement, the incentive to engage in such strategic behaviour by any operator is diminished by: (i) the uncertainty about how this market will develop, which makes any profits from attempting to foreclose rivals less predictable; and (ii) Ofcom's requirement for gateway licensees to commence and maintain transmissions within 12 months of being granted a licence. The ability to engage in such behaviour is also dependent on rival operators not having the option of alternative gateway sites (including potentially in other countries).
- 4.6 Since Kuiper has applied for only one gateway site in Cornwall, our preliminary view is that potential risk 3 is unlikely to materialise.

Potential risk 4: Gateways creating harmful interference into existing NGSO gateways and/or user terminals, resulting in weakened competition and worse outcomes for consumers

- 4.7 As set out in section 3, Kuiper Systems LLC has reached a coordination agreement with one existing licensee (Telesat). In addition, our preliminary view is that Kuiper's proposed NGSO gateway is capable of coexisting with other co-frequency NGSO systems and gateway earth stations. Since the competition concern outlined in this risk scenario would be caused by harmful interference, our preliminary view is that potential risk 4 is unlikely to materialise.

Potential risk 5: Gateways being unable to coexist with future NGSO systems, creating a barrier to entry and in turn restricting competition

- 4.8 Similar to the above, there is a risk that an NGSO gateway imposes constraints on subsequent NGSO entrants due to technical barriers to coexistence between that NGSO system and future NGSO systems (including gateways). This could form a barrier to entry, reducing competition and consumer choice, leading to worse outcomes for consumers.
- 4.9 As set out in section 3, our preliminary view is that the techniques described for flexibly accommodating new entrants in Kuiper's NGSO gateway application, should be sufficient to ensure its NGSO gateway will be capable of coexisting with future NGSO systems (including gateways and user terminals). Accordingly, our preliminary view is that potential risk 5 is unlikely to materialise.

Benefits

- 4.10 In its application, Kuiper states that this gateway would connect to its Kuiper NGSO satellite system (which we granted a licence for in February). This would support Kuiper's plans to provide high speed, low latency wireless broadband services from satellites to a variety of customers in the UK, including households, schools, hospitals, government offices, businesses, first responders, and disaster relief operations.¹⁰ These services could be delivered directly to customers, or via local and regional partners who would on-sell services to enterprise users and public entities. Kuiper also intends to provide backhaul

¹⁰ Depending on the NGSO system design, siting a gateway in the UK can be expected to lead to a higher quality of service, such as lower latency and higher capacity, due to closer proximity to customers.

connectivity to telecommunications carriers. Kuiper plans to offer these services throughout the UK,¹¹ and expects more than 75% of its customers to be located outside the southeast of England, including in Wales, Scotland and Northern Ireland.

- 4.11 Our preliminary view is that granting this licence would help Kuiper initiate its offer of high speed, low latency broadband services, including potentially connecting customers in some harder to reach locations in the UK. We also expect that granting this licence has the potential to enhance competition in the provision of retail satellite broadband services delivered directly to consumers, such as individual households, where currently there is only one NGSO provider in the UK.
- 4.12 Overall, should these services be deployed, we expect they would benefit UK customers, end consumers, and citizens.

Our initial view

- 4.13 Our preliminary view is that potential scarcity and coexistence competition risks are unlikely to materialise.
- 4.14 In relation to benefits, granting this licence would help Kuiper initiate its offer of high speed, low latency broadband services, including potentially connecting customers in some harder to reach locations in the UK, which would benefit UK customers, end consumers and citizens. Granting this licence also has the potential to enhance competition in the provision of satellite broadband services directly to consumers, where currently there is only one NGSO provider in the UK.
- 4.15 Our preliminary assessment is that granting this licence would create benefits that are likely to exceed any costs or risks.
- 4.16 We invite stakeholder views on the potential impact of Kuiper's licence application on competition.

Consultation question 3

Do you expect that granting this NGSO gateway licence would benefit or harm competition between NGSO services in the UK? Please provide details.

¹¹ Kuiper states that the coverage limit of its first-generation NGSO system is 56 degrees latitude North (which we note crosses Scotland at Falkirk and the Firth of Forth), and that it plans to cover latitudes above 56 degrees in future generations of its NGSO system.

5. Additional comments and impact assessments

Additional comments

- 5.1 We invite comments from stakeholders on any other issues regarding Kuiper's application for an NGSO gateway licence.

Consultation question 4

Do you have any additional concerns or comments regarding the application?

Equality and Welsh language impact assessments

- 5.2 We have assessed the likely impacts and benefits of granting Kuiper's NGSO gateway licence on persons sharing protected characteristics, and on the Welsh language, as set out in annex 1 of this consultation. We have not identified any adverse impacts on persons sharing protected characteristics that mean they are likely to be affected in a different way to the general population, nor did we consider that our proposals have any negative impact on our Welsh language obligations.
- 5.3 We also consider that our proposal to grant Kuiper's NGSO gateway licence would support Kuiper's plans to provide broadband and backhaul connectivity via satellite. This is likely to have positive impacts on households, businesses and other customers in the UK, including in some harder to reach areas, improving equality of opportunity in those areas (Kuiper expects more than 75% of its customers to be located outside the southeast of England, including in Wales, Scotland and Northern Ireland). It also has the potential for increased connectivity in Wales which may provide more opportunities to use the Welsh language.
- 5.4 We invite stakeholders to provide their views on the following questions:

Consultation question 5

Do you agree with our assessment of the potential impact of our proposal on specific groups of persons?

Consultation question 6

Do you agree with our assessment of the potential impact of our proposal on the Welsh language?

6. Our proposals and next steps

How we decide whether to grant an NGSO gateway licence

- 6.1 Our [2021 NGSO statement](#) explains the considerations we would take into account when deciding whether to grant an NGSO licence:
- a) our technical coexistence checks;
 - b) our competition check;
 - c) our impact assessments¹²;
 - d) our statutory duties, as set out in section 3 of the Wireless Telegraphy Act 2006 and section 3 of the Communications Act 2003, with our principal duty being to further the interests of citizens and consumers in relation to communications matters, where appropriate by promoting competition;
 - e) our NGSO licensing objectives, including to enable citizen and consumer benefits arising from innovative satellite services, such as improved connectivity; and
 - f) any other available relevant evidence, including the application, consultation responses and any further information provided by the applicant.
- 6.2 In exercising our regulatory functions, we are also required to have regard to the desirability of promoting economic growth.¹³

Our proposal

- 6.3 Taking account of the evidence presented by Kuiper, our initial assessment of the potential impacts on coexistence and competition, and other risks and benefits of granting this NGSO gateway licence application, we propose to grant Kuiper's application for an NGSO gateway licence operating in Ka band frequencies 27.5-27.9505 GHz, 28.4445-28.9585 GHz and 29.4525-30 GHz.

Next steps

- 6.4 We welcome comments on Kuiper's NGSO licence application by 5pm on Tuesday 29 July 2025. Responses should be submitted electronically to NGSO.licensing@ofcom.org.uk using the response form set out in annex 4.
- 6.5 Where stakeholders wish to submit confidential views, we request that a non-confidential version of the response also be provided where possible, to improve the transparency of our NGSO licensing process.

¹² See annex 1 for full details of the impact assessments carried out.

¹³ Section 110(3) of the Deregulation Act 2015 requires us to have regard to the [Growth Duty: Statutory Guidance](#) (revised by the Government in May 2024).

- 6.6 We will consider all responses carefully before making our NGSO licensing decision. We may seek additional information from Kuiper to resolve queries raised in consultation responses.
- 6.7 Our decision will be published on our website in due course. Where we decide to grant Kuiper an NGSO gateway licence to operate in the Ka band in the UK, subject to payment of the licence fee, this will also be published under the “Existing licences” section of our [NGSO licensing webpage](#).

A1. Impact assessments

Impact assessment

- A1.1 Section 7 of the Communications Act 2003 (the Act) requires us to carry out and publish an assessment of the likely impact of implementing a proposal which would be likely to have a significant impact on businesses or the general public, or when there is a major change in Ofcom's activities.
- A1.2 Impact assessments form part of good policy making and we therefore expect to carry them out in relation to a large majority of our proposals. We use impact assessments to help us understand and assess the potential impact of our policy decisions before we make them. They also help us explain the policy decisions we have decided to take and why we consider those decisions best fulfil our applicable duties and objectives in the least intrusive way. Our impact assessment guidance sets out our general approach to how we assess and present the impact of our proposed decisions and section 4 of our 2021 NGSO statement sets out how we assess the impact of applications for NGSO gateway licences.
- A1.3 Having carefully considered the potential impact of granting an NGSO gateway licence to Kuiper in this consultation, our preliminary view is that it has the potential to support Kuiper's plans to improve UK broadband and backhaul connectivity, thereby providing more choice and resulting in an overall positive impact for UK consumers, customers and citizens. We assess the potential impact of granting the NGSO gateway licence on coexistence and competition more fully in sections 3 and 4 above. Our initial view is that Kuiper is unlikely to cause harmful interference to other services in the frequencies it intends to use. Further, our NGSO licence conditions require licensees to cooperate with each other so they can coexist, and we are able use our enforcement powers to remedy any issues that arise.

Equality impact assessment

- A1.4 We have given careful consideration to whether our proposals will have a particular impact on persons sharing protected characteristics (broadly including race, age, disability, sex, sexual orientation, gender reassignment, pregnancy and maternity, marriage and civil partnership, and religion or belief in the UK, and also dependents and political opinion in Northern Ireland), and in particular if they may discriminate against such persons or impact on equality of opportunity or good relations. This assessment helps us comply with our duties under the Equality Act 2010 and the Northern Ireland Act 1998.
- A1.5 When thinking about equality we think more broadly than persons that share protected characteristics identified in equalities legislation and think about potential impacts on various groups of persons (see paragraph 4.7 of our impact assessment guidance).
- A1.6 In particular, section 3(4) of the Act requires us to have regard to the needs and interests of specific groups of persons when performing our duties, as appear to us to be relevant in the circumstances. These include:
- the vulnerability of children and of others whose circumstances appear to us to put them in need of special protection;

- the needs of persons with disabilities, older persons and persons on low incomes; and
 - the different interests of persons in the different parts of the UK, of the different ethnic communities within the UK and of persons living in rural and in urban areas.
- A1.7 We also examine the potential impact our policy is likely to have on people, depending on their personal circumstances. This assists us in making sure that we are meeting our principal duty of furthering the interests of citizens and consumers, regardless of their background and identity.
- A1.8 Kuiper’s proposed gateway would support its plans to provide high speed, low latency wireless broadband services from satellites to households, businesses and other customers, as well as backhaul connectivity to telecommunications carriers using the Ka band in the UK (details can be found in annex 1 to Kuiper’s NGSO licence application). We have assessed the impacts and benefits of granting Kuiper’s NGSO gateway licence on specific groups of persons, including those sharing protected characteristics. We consider our proposal to grant Kuiper’s NGSO gateway licence is likely to have positive impacts on households, businesses and other customers in the UK. This includes improving connectivity in more rural and remote areas of the UK; Kuiper expects more than 75% of its customers to be located outside the southeast of England, including in Wales, Scotland and Northern Ireland, which will help to improve equality of opportunity in those areas¹⁴. We have not identified any adverse impacts on specific groups of persons, including those sharing protected characteristics, that are likely to be affected in a different way to the general population through the granting of this NGSO gateway licence.

Welsh language impact assessment

- A1.9 We are required to take Welsh language considerations into account when formulating, reviewing, or revising policies which are relevant to Wales (including proposals which are not targeted at Wales specifically but are of interest across the UK).¹⁵
- A1.10 Where the Welsh Language Standards are engaged, we consider the potential impact of a policy proposal on (i) opportunities for persons to use the Welsh language; and (ii) treating the Welsh language no less favourably than the English language. We also consider how a proposal could be formulated to have or to increase, a positive impact, or not to have or to decrease any adverse effects.
- A1.11 We consider our proposal to grant Kuiper an NGSO gateway licence will not have any negative impacts on our Welsh language obligations, as it relates to a nationwide licensing regime and the relevant licence products are available for anyone within the UK to apply. We consider that our proposal also has the potential for increased connectivity in Wales, which may provide more opportunities to use the Welsh language.
- A1.12 We will continue to produce spectrum licences, including NGSO licences, in Welsh when requested, in accordance with our obligations set by the Welsh Language Commissioner.

¹⁴ As explained in footnote 4, Kuiper’s Gen1 NGSO system will only extend to 56 degrees latitude north.

¹⁵ See Standards 84-89 of [Hysbysiad cydymffurfio](#) (in Welsh) and [compliance notice](#) (in English). Section 7 of the Welsh Language Commissioner’s [Good Practice Advice Document](#) provides further advice and information on how bodies must comply with the Welsh Language Standards.

A2. Responding to this consultation

How to respond

- A2.1 We invite views and comments on the issues discussed in this document by 5pm on 29 July 2025.
- A2.2 You can download a response form from <https://www.ofcom.org.uk/spectrum/space-and-satellites/consultation-amazon-kuiper-uk-limited-application-for-a-non-geostationary-gateway-earth-station-licence>. You can return this by email or post to the address provided in the response form.
- A2.3 If your response is a large file, or has supporting charts, tables or other data, please email it to NGSO.licensing@ofcom.org.uk, as an attachment in Microsoft Word format, together with the cover sheet at annex 4.
- A2.4 To ensure we can receive and assess all comments in a timely manner, we will not accept responses via post.
- A2.5 We welcome responses in formats other than print, for example an audio recording or a British Sign Language video. To respond in BSL:
- send us a recording of you signing your response. This should be no longer than 5 minutes. Suitable file formats are DVDs, wmv or QuickTime files; or
 - upload a video of you signing your response directly to YouTube (or another hosting site) and send us the link.
- A2.6 We will publish a transcript of any audio or video responses we receive (unless your response is confidential).
- A2.7 We do not need a paper copy of your response as well as an electronic version. We will acknowledge receipt of a response submitted to us by email.
- A2.8 You do not have to answer all the questions in the consultation if you do not have a view; a short response on just one point is fine. We also welcome joint responses.
- A2.9 It would be helpful if your response could include direct answers to the questions asked in the consultation document. The consultation questions are listed at annex 5. It would also help if you could explain why you hold your views, and what you think the effect of our proposals would be.
- A2.10 If you want to discuss the issues and questions raised in this consultation, please email the NGSO licensing team at NGSO.licensing@ofcom.org.uk.

Confidentiality

- A2.11 Consultations are more effective if we publish the responses before the consultation period closes. This can help people and organisations with limited resources or familiarity with the issues to respond in a more informed way. So, in the interests of transparency and good regulatory practice, and because we believe it is important that everyone who is interested in an issue can see other respondents' views, we usually publish responses on our website at regular intervals during and after the consultation period.
- A2.12 If you think your response should be kept confidential, please specify which part(s) this applies to and explain why. Please send any confidential sections as a separate annex. If you want your name, address, other contact details or job title to remain confidential, please provide them only in the cover sheet, so that we don't have to edit your response.
- A2.13 If someone asks us to keep part or all of a response confidential, we will treat this request seriously and try to respect it. But sometimes we will need to publish all responses, including those that are marked as confidential, in order to meet legal obligations.
- A2.14 To fulfil our pre-disclosure duty, we may share a copy of your response with the relevant government department before we publish it on our website.
- A2.15 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Our intellectual property rights are explained further in our [Terms of Use](#).

Next steps

- A2.16 Following this consultation period, we plan to publish a statement setting out our NGSO licensing decision, as soon as practicable.
- A2.17 If you wish, you can [register to receive mail updates](#) alerting you to new Ofcom publications.

Our consultation processes

- A2.18 We aim to make responding to a consultation as easy as possible. For more information, please see our consultation principles in annex 3.
- A2.19 If you have any comments or suggestions on how we manage our consultations, please email us at consult@ofcom.org.uk. We particularly welcome ideas on how we could more effectively seek the views of groups or individuals, such as small businesses and residential consumers, who are less likely to give their opinions through a formal consultation.
- A2.20 If you would like to discuss these issues, or our consultation processes more generally, please contact the corporation secretary:

Corporation Secretary
Ofcom
Riverside House
2a Southwark Bridge Road
London SE1 9HA
Email: corporationsecretary@ofcom.org.uk

A3. Ofcom's consultation principles

A1.1 We have seven principles that we follow for every public written consultation:

Before the consultation

A1.2 Wherever possible, we will hold informal talks with people and organisations before announcing a big consultation, to find out whether we are thinking along the right lines. If we do not have enough time to do this, we will hold an open meeting to explain our proposals, shortly after announcing the consultation.

During the consultation

A1.3 We will be clear about whom we are consulting, why, on what questions and for how long.

A1.4 We will make the consultation document as short and simple as possible, with an overview of no more than two pages. We will try to make it as easy as possible for people to give us a written response.

A1.5 We will consult for up to ten weeks, depending on the potential impact of our proposals.

A1.6 A person within Ofcom will be in charge of making sure we follow our own guidelines and aim to reach the largest possible number of people and organisations who may be interested in the outcome of our decisions. Our Consultation Champion is the main person to contact if you have views on the way we run our consultations.

A1.7 If we are not able to follow any of these seven principles, we will explain why.

After the consultation

A1.8 We think it is important that everyone who is interested in an issue can see other people's views, so we usually publish the responses on our website at regular intervals during and after the consultation period. After the consultation we will make our decisions and publish a statement explaining what we are going to do, and why, showing how respondents' views helped to shape these decisions.

A4. Consultation coversheet

Basic details

Consultation title:

To (Ofcom contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

Confidentiality

Please tick below what part of your response you consider is confidential, giving your reasons why

- Nothing ☐
- Name/contact details/job title ☐
- Whole response ☐
- Organisation ☐
- Part of the response ☐

If you selected 'Part of the response', please specify which parts:

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

Yes ☐ No ☐

Declaration

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom aims to publish responses at regular intervals during and after the consultation period. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)

A5. Consultation questions

- A5.1 We invite comments from stakeholders on Kuiper's application for an NGSO gateway licence in relation to the following questions:

Question 1: Do you anticipate this NGSO gateway earth station will pose coexistence challenges to existing NGSO systems?

Question 2: Are the measures set out by the applicant to enable coexistence with future NGSO systems reasonable?

Question 3: Do you expect that granting this NGSO gateway licence would benefit or harm competition between NGSO services in the UK? Please provide details.

Question 4: Do you have any additional concerns or comments regarding the application?

Question 5: Do you agree with our assessment of the potential impact of our proposal on specific groups of persons?

Question 6: Do you agree with our assessment of the potential impact of our proposal on the Welsh language?

Please tell us how you came across this consultation.

- ☐ Email from Ofcom
- ☐ Saw it on social media
- ☐ Found it on Ofcom's website
- ☐ Found it on another website
- ☐ Heard about it on TV or radio
- ☐ Read about it in a newspaper or magazine
- ☐ Heard about it at an event
- ☐ Somebody told me or shared it with me
- ☐ Other (please specify)