

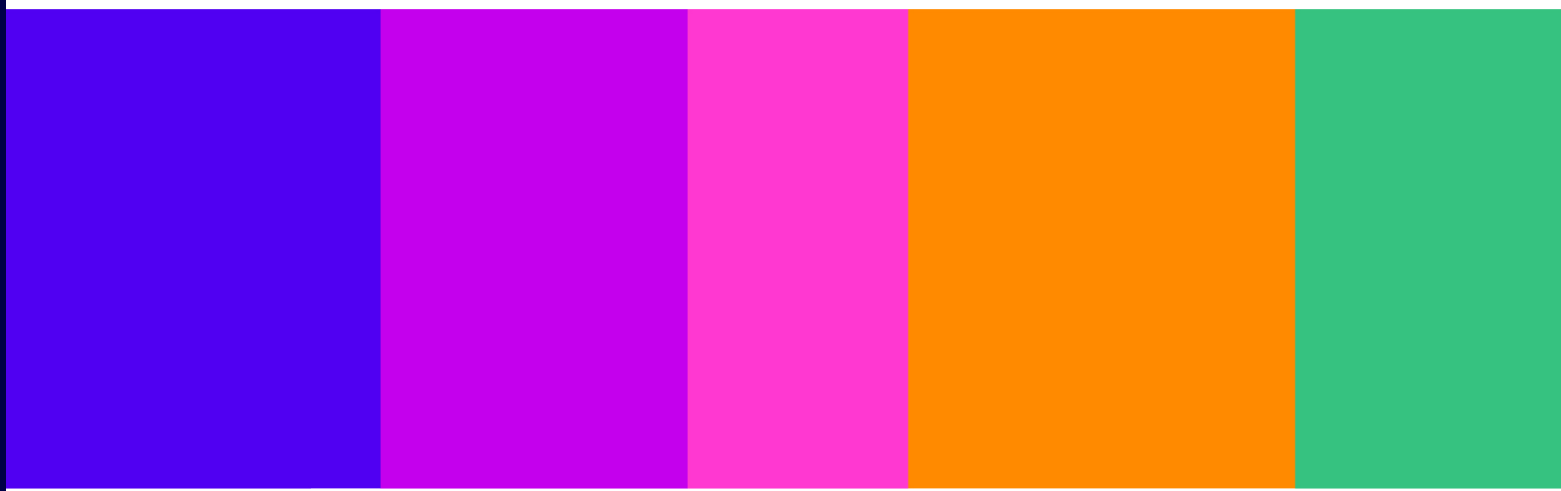
# Updates to Procedures for the management of satellite filings

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## Consultation

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# 1. Overview

- 1.1 Satellite networks and other space services make use of scarce and finite resources - radio frequencies and orbital positions. These need to be carefully planned and coordinated at an international level as satellites provide regional or global services. This process, the management of satellite filings, takes place within a framework of international rules operated by the International Telecommunication Union (ITU).
- 1.2 Ofcom represents the UK in the ITU and manages satellite filings for companies or other organisations registered in the UK, the British Overseas Territories, the Channel Islands and the Isle of Man. While the overall number of filings that we manage annually has remained broadly static, the number of operators who apply through the UK and the range of services has increased.
- 1.3 We publish Procedures which applicants must follow when applying for a satellite filing and which set out ongoing requirements for satellite operators. This ensures compliance with the international regulations. We update these Procedures every few years to reflect changes to the international regulations that govern the process for satellite filings, and other national issues as appropriate.
- 1.4 This document consults on our proposed updates to our Procedures for the management of satellite filings. We have published [a marked-up version](#) of the Procedures document alongside this consultation showing our proposed updates to the text. We have also published [a clean version](#) and a version showing our proposed updates in [tabular format](#).

## What we are proposing – in brief

We are proposing to update the Procedures to include changes to the international rules agreed in the 2019 and 2023 World Radiocommunication Conferences to introduce:

- Requirement to submit EPFD Masks;
- Requirement to meet non-GSO deployment milestones;
- Requirement to state if a satellite has deviated from the notified orbit;
- Post-milestone reporting procedure for non-GSO systems;
- Requirement to state if a satellite has been used for bringing into use purposes in the last 3 years.

We are also proposing to make a number of other updates to our Procedures. These updates are to provide additional clarity around our existing processes and do not reflect any substantive changes to our approach:

- To provide additional clarity around how we interact with Government in fulfilling our satellite filings role;
- To clarify how we deal with requests to lease satellites for bringing into use purposes;
- To include text encouraging all applicants for UK satellite filings to comply with best practice guidelines for space sustainability;

- To explain how we manage applications for filings under Regulation No. 4.4 of the Radio Regulations;
- To explain additional process steps that apply to applications for UK2.1 frequencies;
- To make a number of minor editorial changes to our Procedures, e.g. to reflect changes in the space environment since we last updated our Procedures.

## 2. Introduction

### The satellite filings process

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- 2.1 Before a satellite can use the spectrum and orbital resources it needs to fulfil its mission, it requires an associated 'satellite filing' to obtain international recognition of these resources.
- 2.2 The satellite filings process is managed under a framework of international rules operated by the International Telecommunication Union (ITU), a specialised agency of the United Nations.
- 2.3 The Radio Regulations, which are part of the treaty documents governing the ITU and its 193 member states (including the UK), contain procedures for the notification, coordination and registration of satellite filings and place certain rights and obligations onto the ITU member states. These procedures are designed to ensure that satellite networks operate without interfering with each other and also that spectrum and orbital resources are used efficiently.
- 2.4 Changes to the rules and procedures are made every four years at the World Radiocommunication Conference (WRC) held by the ITU.

### Ofcom's role

- 2.5 Ofcom represents the UK in the ITU and acts as the notifying administration for the management of satellite filings for companies or other organisations registered in the UK, the British Overseas Territories, the Channel Islands and the Isle of Man.
- 2.6 The UK manages around 300 satellite filings in the UK. The majority are for GSO satellites but a growing number of filings are for NGSO satellite services and novel space services such as lunar missions. The number of operators filing through the UK has also grown over the last 10 years, reflecting an increase in the number of UK satellite operators.
- 2.7 In undertaking its role, Ofcom reviews new submissions, ensuring their compliance with our National Procedures and the International Radio Regulations prior to their submission to the ITU, and facilitates frequency coordination with satellite networks of other administrations. The final objective of these processes is to register the satellite network with the ITU, on the Master International Frequency Register (MIFR), so that its frequency assignments obtain international recognition.
- 2.8 Throughout the lifetime of each satellite network, Ofcom will work with the satellite operator to periodically check the status of its operating frequency assignments, facilitate coordination with other satellite networks and cancel filings if they are no longer required.

### The Procedures

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- 2.9 In 2007 Ofcom published the Procedures for the Management of Satellite Filings, referred to hereafter in this document as the 'Procedures'. The Procedures set out how satellite operators should submit applications for satellite filings to Ofcom and the criteria and procedures that we apply for the management of satellite network filings.

- 2.10 An applicant for satellite filings under these Procedures must be a company or organisation registered, or having its headquarters, in the UK, British Overseas Territories, the Channel Islands or the Isle of Man.
- 2.11 The most recent update to the Procedures was made in 2019. This update introduced charges for our satellite filings work and did not include any international rule changes. The previous update, in March 2016, included changes to international rules that had been agreed in the previous three World Radiocommunication Conferences (in 2009, 2012 and 2015).

## Proposals in this document

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- 2.12 This document includes proposals to make changes to the current (2019) version of the Procedures to:
- a) bring the Procedures into line with changes made to the Radio Regulations at the last two World Radiocommunication Conferences, WRC-19 and WRC-23; and
  - b) include text to provide additional clarity or guidance on certain aspects of our satellite filings work, and to make general editorial updates to the text.
- 2.13 In preparing the proposals in this document, we have also taken account of the UK Government's [2024 Space Regulatory Review](#).
- 2.14 We have published a [marked-up version](#) of the Procedures document alongside this consultation showing our proposed updates to the text. We have also published [a clean version](#) and a version showing our proposed updates in [tabular format](#).

## Legal framework

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- 2.15 Ofcom's statutory powers and duties in relation to spectrum management are set out primarily in the Communications Act 2003 (the "2003 Act") and the Wireless Telegraphy Act 2006 (the "WT Act").
- 2.16 Our principal duties under the 2003 Act are to further the interests of citizens and consumers in respect to communications matters, where appropriate by promoting competition. In doing so, we are also required (among other things) to secure the optimal use of spectrum and the availability throughout the United Kingdom of a wide range of electronic communications services.
- 2.17 Our spectrum management duties under the 2003 Act require us to have regard to:
- a) the desirability of promoting competition in relevant markets;
  - b) the desirability of encouraging investment and innovation in relevant markets;
  - c) the different needs and interests, so far as the use of the electro-magnetic spectrum for wireless telegraphy is concerned, of all persons who may wish to make use of it; and
  - d) the different interests of persons in the different parts of the United Kingdom, of the different ethnic communities within the United Kingdom and of persons living in rural and in urban areas.
- 2.18 Provisions of the 2003 Act relevant to Ofcom's international functions, such as satellite filings, include the following:

- a) Section 5 of the 2003 Act gives the Secretary of State power to give directions to Ofcom for the purpose of securing compliance with international obligations, as well as for other specified purposes such as in the interests of national security.
- b) Section 22 of the 2003 Act imposes a duty on Ofcom to do such things as it is required to do by the Secretary of State to represent the UK on international and other bodies in relation to communications matters. Section 22 also provides Ofcom with the power to represent the British Overseas Territories, the Channel Islands and the Isle of Man if requested to do so by the Secretary of State.

2.19 In December 2003, the Secretary of State (SoS) made directions to Ofcom under section 22 of the 2003 Act, requiring Ofcom to represent the UK Government on certain international bodies including the ITU. These directions are included in [Annex A of the January 2004 Memorandum of Understanding \(MoU\)](#) between Ofcom and the SoS, published on our website.

2.20 In October 2007, the SoS and Ofcom entered into another [MoU](#) relating to Ofcom's representation of the Channel Islands, the Isle of Man and the British Overseas Territories in the ITU.

### The desirability of promoting economic growth

2.21 In exercising our regulatory functions, we are also required to have regard to the desirability of promoting economic growth (the “**growth duty**”).<sup>1</sup> In particular, we must consider the importance for the promotion of economic growth of exercising the regulatory function in a way which ensures that regulatory action is taken only when it is needed, and any action taken is proportionate. Section 110(3) of the Deregulation Act 2015 requires us to have regard to the “Growth Duty: Statutory Guidance” (revised by Government in May 2024).

## International legal framework

2.22 The ITU is a specialised agency within the United Nations system of organisations where representatives from governments and the private sector coordinate global telecommunications networks and services. The instruments of the ITU are the Constitution, Convention and Administrative Regulations (of which the Radio Regulations are a part). Together these three instruments form an international treaty governing the use of the radio spectrum to which the signatory ITU Member States, including the UK, are bound. These instruments contain the main principles and regulations governing the following major elements:

- a) frequency allocations to different categories of radiocommunication services;
- b) the rights and obligations of Member States in obtaining access to the spectrum/orbit resources; and,
- c) international recognition of these rights by recording frequency assignments and, as appropriate, orbital positions used or intended to be used in the Master Register.

2.23 Article 6 Para 1 (CS 37) of the Constitution provides that the:

**“Member States are bound to abide by the provisions of this Constitution, the Convention and the Administrative Regulations in all**

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<sup>1</sup> Section 108 of the Deregulation Act 2015, which was extended to Ofcom's regulatory functions by The Economic Growth (Regulatory Functions) (Amendment) Order 2024.

telecommunication offices and stations established or operated by them which engage in international services or which are capable of causing harmful interference to radio services of other countries”.

## Structure of this document

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2.24 The rest of this document is structured as follows:

- Section 3 sets out proposed changes to the Procedures to reflect changes to the international rules as agreed at WRC-19 and WRC-23;
- Section 4 sets out proposed changes to the Procedures to provide clarification and guidance on certain aspects of our satellite filings work.



# 3. Updates to reflect World Radiocommunication Conference decisions

## Introduction

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- 3.1 This section presents our proposed updates to the Procedures to reflect changes to the international rules that were agreed at the two most recent World Radiocommunication Conferences, WRC-19 and WRC-23.
- 3.2 In practice, we start to require operators to meet new requirements arising from international rule changes as soon as decisions taken at World Radiocommunication Conferences come into force. The updates that we are proposing in this section are to ensure that our Procedures accurately reflect these requirements.
- 3.3 We have identified five areas where decisions made at either WRC-19 or WRC-23 directly relate to how we manage satellite filings. The first four relate to requirements for non-GSO systems and the fifth relates to GSO systems.

## Description of updates

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### Item 1 – Requirement to submit EPFD Masks

- 3.4 Article 22 of the Radio Regulations specifies power limits that non-GSO systems must meet. These limits, referred to as Equivalent Power Flux Density (EPFD) limits, are designed to ensure that non-GSO systems can share frequencies whilst protecting GSO networks, without the need for individual coordination.
- 3.5 Non-GSO systems which contain frequency bands subject to Article 22 of the Radio Regulations are required to supply EPFD masks to show that the specified EPFD limits are not exceeded. Recommendation S.1503 of the Radio Regulations provides guidelines for their generation and application.
- 3.6 It is the responsibility of the applicant to prepare EPFD masks and supply them along with the required information set out in ‘Table 1 – Due Diligence Requirements’ in Section 5 of our Procedures.
- 3.7 Operations of non-GSO satellite systems are expected to be carried out within the envelope set out by the filing and by the masks supplied, and applicants will be required to supply a letter of commitment indicating that they shall not operate outside of the limits specified by the mask.
- 3.8 We are proposing to make edits to Sections 2 and 5 of our Procedures to reflect this requirement. **See paragraphs 2.43-2.47 and Stage 1 in Table 1 (page 23) in the marked-up Procedures document.**

## Item 2 – Requirement to meet non-GSO deployment milestones

- 3.9 Under the Radio Regulations, there is a requirement for satellite networks to be brought into use within seven years after the notification of the frequency assignment to the ITU-BR.
- 3.10 Following a decision at WRC-19, Resolution 35 of the Radio Regulations introduced four additional milestone requirements for deployment of non-GSO systems after the initial seven-year regulatory period. These milestones cover a further seven-year period after the initial seven-year regulatory period.
- 3.11 The purpose of these additional milestones is to ensure the deployment of the full non-GSO constellation and therefore the efficient use of the notified frequency assignments and orbital parameters.
- 3.12 We are proposing edits to Sections 2 of our Procedures to explain this process. **See paragraphs 2.55-2.58 in the marked-up Procedures document.**
- 3.13 We are also proposing to update our due diligence requirements in Section 5 of our Procedures to require operators to submit the relevant information to Ofcom **two months** before each of the deployment milestones are due. This should give us sufficient time to check the information provided before submitting it to the ITU-BR. **See Stages 5-8 in Table 1 (page 26) in the marked-up Procedures document.**

## Item 3 – Requirement to state if a satellite has deviated from the notified orbit

- 3.14 All satellite filings need to include essential orbital characteristics, such as planned altitude and inclination.
- 3.15 At WRC-23, a decision was made to include new orbital tolerance requirements for non-GSO systems. These orbital tolerance requirements refer to the permissible variation in altitude and inclination relative to the parameters provided to the ITU. Information on the observed orbital characteristics of the satellites needs to be submitted to the ITU-BR at the point of Bringing Into Use, Bringing Back Into Use or when milestone deployment information is being provided.
- 3.16 We are proposing to make edits to Section 2 of our Procedures to reflect this requirement. **See paragraphs 2.59-2.62 in the marked-up Procedures document.**

## Item 4 – Post-milestone reporting procedure for non-GSO systems

- 3.17 After the milestone process described under item 2 has been completed, Ofcom must continue to communicate non-GSO system deployment information to the ITU every four years. The deadline for providing this information is no later than 30 days after the expiry of each four-year period.

- 3.18 If the number of satellites considered as part of the non-GSO system falls below the total number of satellites indicated<sup>2</sup>, additional reporting requirements apply.
- 3.19 We are proposing edits to Section 2 of our Procedures to explain this process. **See paragraphs 2.63-2.66 in the marked-up Procedures document.**
- 3.20 We are also proposing to update our due diligence requirements in Section 5 of our Procedures to require operators to submit the relevant information to Ofcom no later than the end of each four-year period. This will give us 30 days to carry out our due diligence checks before submitting the information to the ITU-BR. **See Stage 9 in Table 1 (page 26) in the marked-up Procedures document.**

## **Item 5 – Requirement to state if satellite has been used for bringing into use purposes in last 3 years**

- 3.21 This information must be supplied by the satellite operator when bringing their GSO network into use, or bringing it back into use. The requirement itself is already captured in the current version of the Procedures document and the update we are making is to clarify that this requirement is based on Resolution 40 in the Radio Regulations.
- 3.22 We are proposing to make edits to Sections 2 and 5 of our Procedures to reflect this update. **See footnote 14 (paragraph 2.84) and Table 1 (page 26) in the marked-up Procedures document.**

**Question 1:** Do you agree with the proposed updated text in relation to WRC decisions? If not, please specify which item you disagree with and provide reasons for your response.

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<sup>2</sup> In the Master Register in Part II-S of the BR IFIC, if available, or in the latest notification information published in the BR IFIC (Part I-S) for the frequency assignments.

# 4. Updates to provide additional clarity and guidance

## Introduction

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- 4.1 In addition to international rule changes, we are also proposing to make updates to a number of other areas in our Procedures. These updates are to provide additional clarity or guidance around our existing processes and do not reflect any substantive changes to our approach.
- 4.2 The key areas we have identified are:
- clarifications relating to our role in managing satellite filings;
  - clarifications on leasing of satellites for bringing into use purposes;
  - guidance relating to space sustainability;
  - clarifications around how we manage applications under No. 4.4 of the Radio Regulations; and
  - clarifications in relation to applications for UK2.1 frequencies.
- 4.3 We are also taking the opportunity to make a number of minor editorial changes to our Procedures including, for example:
- to reflect changes in the space environment since we last updated our Procedures; and
  - to reflect changes of responsibilities, e.g. the Civil Aviation Authority (CAA) has taken over satellite licensing responsibilities from the UK Space Agency (UKSA).
- 4.4 All changes are shown in our marked-up Procedures document, published in parallel with this document.

## Our role in managing satellite filings

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- 4.5 Ofcom's role in managing satellite filings is described in section 3 of our Procedures document. As set out there, "pursuant to a direction from the Secretary of State under section 22 of the 2003 Communications Act, Ofcom represents the UK Government in the ITU and acts as the UK notifying administration under ITU procedures in relation to international management of the radio spectrum and orbit resources".
- 4.6 In carrying out this role, we discuss issues with relevant Government departments and agencies as needed. An example of this is in relation to requests to lease satellites for bringing into use purposes, as outlined further below. We may also share satellite filing information with these departments and agencies<sup>3</sup>. We may do this at any stage of the satellite filings process and throughout the lifetime of the filing in relation to any decision

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<sup>3</sup> The information required would typically be high-level information about the filing, rather than technical data. We note that, once a satellite filing has been published in the BR IFIC, the full information would be in the public domain.

which may affect the national security or interests of the UK, as determined by the UK Government. In line with section 22 of the 2003 Act, the Secretary of State may require Ofcom to act in accordance with any guidance it provides.

- 4.7 We are proposing to update section 3 of our Procedures to include additional text which explains how we engage with Government in relation to our work on satellite filings. To be clear, the textual changes we are proposing do not reflect a new approach to our interactions with Government but, rather, seek to provide additional transparency and clarity on our existing approach. **See paragraph 3.4 of the marked-up Procedures document.**

## Leasing of satellites for bringing into use purposes

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- 4.8 Under a decision made in the 2012 World Radiocommunication Conference (WRC-12), if an administration wishes to bring in to use (or continue the use of) one of its filings by leasing a satellite which is under the responsibility of another administration, it should notify that administration. The administration receiving this notification then has 90 days from the date of receipt of information to object to the use of this satellite for such purposes.
- 4.9 In the case where we become aware of a request from another administration to lease a UK-licensed satellite to bring into use a filing, we would discuss this request with the Civil Aviation Authority (as the UK's satellite licensing authority, it would need to authorise the drift of a UK satellite) and other relevant Government departments as appropriate.
- 4.10 We are proposing to update Section 2 of the Procedures to include additional text setting out the process for leasing satellites under the responsibility of other administrations to bring filings into use. **See paragraphs 2.85-2.86 of the marked-up Procedures document.**

## Space sustainability

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- 4.11 Space sustainability broadly refers to maintaining the ability to make use of space to meet the current needs of society without compromising the needs of future generations<sup>4</sup>. In its [2024 Space Regulatory Review](#), the UK Government identified 'Safety and Sustainability' as one its 7 priority regulatory outcomes for the UK space environment.
- 4.12 In the UK, the Civil Aviation Authority (CAA) is responsible for the licensing of space objects, including satellites, and places requirements on operators in relation to sustainability. For example, operators are required to submit a space debris mitigation plan as part of their application for a satellite licence.
- 4.13 Ofcom's role in relation to the management of satellite filings is focused on the efficient use of spectrum and orbits. We do not have any specific remit related to space sustainability and our Procedures do not include requirements related to space debris or environmental issues.
- 4.14 In view of our remit, and that of CAA, we are proposing not to introduce additional sustainability requirements on operators as part of our satellite filings procedures, but

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<sup>4</sup> [UNOOSA](#) defines space sustainability as "the ability to maintain the conduct of space activities indefinitely into the future in a manner that realizes the objectives of equitable access to the benefits of the exploration and use of outer space for peaceful purposes, in order to meet the needs of the present generations while preserving the outer space environment for future generations".

instead update the Procedures to signpost this issue and consider that it would be appropriate for us to include text in our Procedures to encourage all applicants for UK satellite filings to note and comply with best practice guidelines for space sustainability.

- 4.15 In its [technical question set for orbital operators](#), the CAA asks applicants to set out how certain guidelines on space sustainability have been considered, including the [IADC Space Debris Guidelines](#).
- 4.16 We are proposing to include text in Section 4 of our Procedures encouraging operators to comply with these Guidelines. **See paragraphs 4.12-4.13 of the marked-up Procedures document.**

## Radio Regulation No. 4.4

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- 4.17 The Radio Regulations contain a table (the Table of Frequency Allocations) that lists the frequency bands allocated to different services, with footnotes detailing any exceptions or restrictions. The purpose of defining frequency allocations in this way is to manage the risk of interference between different radio services and ensure that everyone can use the radio spectrum effectively.
- 4.18 For this reason, we generally expect applicants for satellite filings to apply for frequency assignments which fall within the Table of Frequency Allocations in the Radio Regulations.
- 4.19 However, we recognise that there may be some cases where this is not possible. In such situations, it may be appropriate to allow applications for use under No. 4.4 of the Radio Regulations. This Regulation enables countries to use frequencies in derogation of (that is, in a way that is not in conformity with) the Radio Regulations on a non-interference, non-protection basis.
- 4.20 For example, there may be cases where the use of different frequencies could enable early realisation of citizen and consumer benefits from new services or technologies, and where there is reason to be confident this can be done without causing harmful interference to other authorised spectrum users. There may also be occasions when there is a clear direction of travel towards frequencies being agreed internationally for a new use but where changes to regulations have not yet been implemented. In these cases it may be appropriate to authorise such use under No. 4.4 on an interim basis until regulations have been updated. There may also be other innovation-related exceptions.
- 4.21 In view of this, we propose to update our Procedures to include information on how we deal with applications for assignments under Regulation No. 4.4. We propose that we would take account of the following factors in our decisions:
- a) whether the requested frequencies are under consideration to be included in the Radio Regulations in a future World Radiocommunication Conference;
  - b) whether there is evidence that the application could promote economic growth and enable early realisation of citizen and consumer benefits from new services or technologies; and
  - c) whether there is reason to be confident that the proposed use would not result in harmful interference to other authorised spectrum users.

## Measures to avoid harmful interference under No. 4.4

- 4.22 The ITU Radio Regulations puts an obligation on notifying administrations to provide a confirmation that assignments under No. 4.4 will not cause harmful interference to other frequency assignments that comply with the Radio Regulations and that it has “identified measures to avoid harmful interference and to immediately eliminate such in case of a complaint.”
- 4.23 We expect applicants for assignments under No. 4.4 to provide evidence that these conditions can be met. Where Ofcom considers that the evidence provided is not sufficient for it to provide a confirmation to the ITU, it may request additional technical evidence as appropriate. If an applicant is unable to provide convincing evidence that it can meet these conditions, the application will be refused. Where further assessment is required, this may impact the timescales for processing applications as specified in the Procedures.
- 4.24 An operator operating under No. 4.4 must provide us with up-to-date contact details for its space operations centre (SOC) prior to the launch of its first satellite. The SOC must be ready to immediately eliminate interference or cease operation of its service if required to do so by Ofcom.
- 4.25 We may cancel a filing if we assess that the operator is not complying with our instructions related to complying with these requirements.
- 4.26 Our proposal for new text on how we deal with applications for assignments under Regulation No. 4.4 is set out in **paragraphs 2.16-2.18 and 6.23-6.27 of the marked-up Procedures document**.

## Applications for UK2.1 frequencies

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- 4.27 In the UK, Ofcom is responsible for authorising civil use of spectrum, while the Ministry of Defence (MOD) authorises military use. The allocations of frequency bands in the UK, including which frequencies are for civil and military use, are set out in the UK Frequency Allocations Table (UKFAT). In this document, Footnote UK2.1 is used to indicate frequency allocations for which authorisation responsibility sits with MOD.
- 4.28 When we receive applications for satellite filings which include UK2.1 frequencies, we may seek comments from the MOD. Consultation with the MOD will occur prior to the initial submission and again prior to the notification of a satellite filing being made to the ITU-BR. Ofcom will only submit the information to the ITU once the MOD has confirmed they have no objections.
- 4.29 The MOD may require the operator to enter into a contract with MOD, setting out conditions for holding a filing for UK2.1 spectrum.
- 4.30 Our Procedures do not currently include any information on how we deal with applications for UK2.1 spectrum. We are proposing to include new text on this subject in Section 4 of our Procedures. **See paragraphs 4.9-4.11 of the marked-up Procedures document**.

**Question 2:** Do you agree with the proposed updated text in relation to a) clarifications to our role and satellite leasing, b) space sustainability, c) No. 4.4 of the Radio Regulations and d) applications for UK2.1 frequencies? If not, please specify which part you disagree with and provide reasons for your response.

**Question 3:** Do you have any additional comments on areas of our Procedures which you consider need updating, e.g. to provide additional clarity or to deal with factual

errors or omissions? If so, please explain which areas and the reasons for your response.

The overview section in this document is a simplified high-level summary only. The proposals we are consulting on and our reasoning are set out in the full document.



# A1. Impact assessments

## Impact assessment

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- 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 policymaking 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.
- A1.3 The proposals we are setting out in this consultation relate to updating text in our Procedures for the management of satellite filings. The updates we are proposing are to:
- a) bring the Procedures into line with changes made to the Radio Regulations at the last two World Radiocommunication Conferences, WRC-19 and WRC-23.
  - b) include text to provide additional clarity or guidance on certain aspects of our satellite filings work, and to make general editorial updates to the text.
- A1.4 As set out in Section 2 of this document, Ofcom is required, under the existing legal framework, to ensure that use of the radio spectrum in the UK complies with the provisions of the Radio Regulations. As such, we are not assessing the impact of the decision to require compliance with updated provisions in the Radio Regulations, as we are already required by the legal framework to do this. Rather, we are assessing the impact of the way that we implement these provisions in the Procedures. For the most part, we have directly reflected the updated provisions in the Radio Regulations in the Procedures. In the case of new non-GSO deployment milestones, we have proposed to require operators to provide information to us 2 months (or 30 days in the case of post-milestone reporting) in advance of the deadlines set out in the Radio Regulations. This is to provide Ofcom with sufficient time to carry out checks for submitting information to the ITU. We consider that these proposed timelines are broadly consistent with other similar timelines in our Procedures and should not result in any negative impacts on satellite operators.
- A1.5 In relation to updates to provide additional clarity or guidance, we note that these updates do not reflect changes to our approach but rather are designed to help ensure operators are better aware of how we undertake certain aspects of our satellite filings work. As such we consider that these proposed updates should only have positive impacts on operators.

## Equality impact assessment

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- A1.6 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 whether 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.

- A1.7 Due to the nature of our proposals, we do not consider that our proposals will affect any specific groups of persons (including persons that share protected characteristics under the 2010 Act or the 1998 Act) differently to the general population.

## Welsh language

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- A1.8 Ofcom is 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).
- A1.9 We do not consider our proposals have any impact on opportunities for persons to use the Welsh language or treating the Welsh language no less favourably than the English language.

# A2. Responding to this consultation

## How to respond

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- A2.1 Ofcom would like to receive views and comments on the issues raised in this document, by 5pm on 9 May 2025.
- A2.2 You can download a response form from <https://www.ofcom.org.uk/spectrum/space-and-satellites/consultation-updates-to-procedures-for-the-management-of-satellite-filings/>. 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 [SatelliteFilingsUpdates@ofcom.org.uk](mailto:SatelliteFilingsUpdates@ofcom.org.uk), as an attachment in Microsoft Word format, together with the cover sheet. This email address is for this consultation only and will not be valid after May 2025.
- A2.4 Responses may alternatively be posted to the address below, marked with the title of the consultation:
- Satellite Filings Review  
Spectrum Group, Ofcom  
Riverside House  
2A Southwark Bridge Road  
London SE1 9HA
- 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 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 Ofcom's proposals would be.
- A2.10 If you want to discuss the issues and questions raised in this consultation, please contact us by email at [SatelliteFilingsUpdates@ofcom.org.uk](mailto:SatelliteFilingsUpdates@ofcom.org.uk).

## Confidentiality

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- 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 the Ofcom 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. Ofcom's intellectual property rights are explained further in our Terms of Use.

## Next steps

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- A2.16 Following this consultation period, Ofcom plans to publish a statement in Autumn 2025.
- A2.17 If you wish, you can register to receive mail updates alerting you to new Ofcom publications.

## Ofcom's consultation processes

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- A2.18 Ofcom aims 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](mailto:consult@ofcom.org.uk). We particularly welcome ideas on how Ofcom 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 Ofcom's 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](mailto:corporationsecretary@ofcom.org.uk)

# A3. Ofcom's consultation principles

Ofcom has seven principles that it follows for every public written consultation:

## Before the consultation

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- A3.1 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

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- A3.2 We will be clear about whom we are consulting, why, on what questions and for how long.
- A3.3 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.
- A3.4 We will consult for up to ten weeks, depending on the potential impact of our proposals.
- A3.5 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. Ofcom's Consultation Champion is the main person to contact if you have views on the way we run our consultations.
- A3.6 If we are not able to follow any of these seven principles, we will explain why.

## After the consultation

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- A3.7 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

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Consultation title:

To (Ofcom contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

## Confidentiality

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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:

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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

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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 in relation to the following questions:

**Question 1:** Do you agree with the proposed updated text in relation to WRC decisions? If not, please specify which item you disagree with and provide reasons for your response.

**Question 2:** Do you agree with the proposed updated text in relation to a) clarifications to our role and satellite leasing, b) space sustainability, c) No. 4.4 of the Radio Regulations and d) applications for UK2.1 frequencies? If not, please specify which part you disagree with and provide reasons for your response.

**Question 3:** Do you have any additional comments on areas of our Procedures which you consider need updating, e.g. to provide additional clarity or to deal with factual errors or omissions? If so, please explain which areas and the reasons for your response.