

## Your response

### Background Information

1. Eutelsat Group was formed in September 2023 through the combination of Eutelsat, a global GEO satellite operator, and LEO constellation operator OneWeb – creating one of the world’s most innovative and experienced commercial satellite operators. The company is headquartered in Paris, with the center of its Low Earth Orbit (LEO) operations based in London.
2. With a fleet of 35 geostationary satellites and a LEO constellation of more than 600 satellites providing capacity for broadcasters, media service providers, telecom operators, ISPs and governmental agencies, Eutelsat Group is the world’s first satellite operator with an integrated GEO-LEO infrastructure. Our satellites are used for video broadcasting, satellite newsgathering, broadband services, data connectivity, connecting aviation and maritime, and enabling mission-critical government and NGO communications.
3. Eutelsat-OneWeb is the business unit of the Eutelsat Group that is responsible for connectivity solutions and operates the LEO satellite constellation.

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<p><b>Question 1:</b> Do you have any comments on Ofcom's proposed Work Plan for 2025/26?</p>	<p>Confidential? N</p> <p>Eutelsat Group welcomes the opportunity to provide comments on Ofcom’s proposed 2025/2026 Plan of Work and applauds Ofcom for recognizing the role of satellite communications in solving connectivity challenges and in contributing to offering, <i>inter alia</i>, improved connectivity services to businesses and citizens across the UK, even in hard-to-reach areas.</p> <p>Eutelsat Group would further like to thank Ofcom for its continuous efforts to support the ever-growing satellite industry by accommodating the sector’s radio spectrum needs and through introducing the necessary regulatory changes to secure technical innovation, long-term investments and the continued development of existing and new satellite capabilities (both GSO and NGSO).</p> <p>In particular, we would like to provide the following comments with regards to Ofcom’s identified milestones for 25/26:</p> <ul style="list-style-type: none"><li>➤ <b>Expanding spectrum access for satellite gateways.</b></li></ul> <p>Q/V bands are key for the future of satellite services and play a critical role in enabling feeder links for the next generation of high and very high throughput satellite systems, and for user terminals, including ESIMs, in a later step.</p>

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As noted also in our previous responses to Ofcom's past consultations (e.g. Ofcom Work Plan 2024/2025, Spectrum Strategy 2022), Eutelsat Group plans to use the FSS allocation in the Q/V band (between 37.5 to 52.4 GHz) for feeder links for our future generation of Gateways. In addition, we kindly note that the WRC-27 Agenda Item 1.3 decided to study the use of the frequency band 51.4-52.4 GHz to enable use by gateway earth stations transmitting to NGSO systems in the fixed-satellite service (Earth-to-space). Eutelsat Group is of the view that allowing access to NGSO gateways in addition to GSO gateways will improve the efficient use of this spectrum. Any new approach to licensing gateway earth stations in the Q/V bands should be based on ensuring access to substantial, contiguous spectrum particularly in the uplink direction for operation of commercial satellite services in the UK.

Eutelsat Group is also considering feeder links in higher frequencies, including E-band, and would welcome a consultation on this matter to assist Ofcom in defining the best approach for enabling additional access to spectrum for satellite.

➤ **Expanding spectrum access for aeronautical and maritime satellite connectivity.**

Eutelsat Group welcomes Ofcom's proposal to expand access to the Ku and Ka bands for satellite terminals for the provision of maritime and aeronautical connectivity services, in implementation of the relevant WRC-23 decisions. ESIM solutions enable seamless global connectivity for maritime and aeronautical users and offer multiple possibilities to passengers and crew onboard aircraft and vessels. Eutelsat Group offers ESIM services for maritime and aeronautical users around the globe and believes that opening access to more spectrum is critical to enabling ESIMs to operate successfully in the UK.

First, we kindly request Ofcom to allow access to the full band 14.0-14.5GHz, removing current restrictions on the use of aeronautical ESIMs within the frequency range 14.47-14.5 GHz when operating in UK airspace.

We believe that the full Ku band 14.0-14.5 GHz should be made available for FSS and AMSS by removing any remaining Fixed Service microwave links in the 14.25-14.5 GHz range.

In addition, we kindly recommend Ofcom the following:

- reviewing limitations imposed by ITU Resolution 902 for the maritime service;

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- reviewing limitations imposed to aircraft earth stations of AMSS by Recommendation ITU-R M.1643;
- adopting ECC Report 279, which recognizes that NGSO terminals operate under the FSS allocation in the 14.0-14.5 GHz, not MSS;
- fully adopting ECC Decision (18)05 on the exemption from individual licensing and the free circulation of all mobility terminals (ESIMs) operating with FSS NGSO satellite systems;
- adopting ECC Report 272 regarding the allowed operations of any satellite terminals near aircraft, inside and outside airports.
- fully implementing ECC Decision (05)10 on the free circulation and use of Earth Stations on board Vessels (ESV) and ECC Decision (05)11 for Aircraft Earth Stations (AES) operating in the Ku frequency band;

Moreover, and more broadly on the Ku band spectrum, Eutelsat Group encourages Ofcom to consider possible revisions of sharing conditions in the frequency band 13.75-14 GHz to allow the use of uplink FSS earth stations with smaller antenna size, in line with the WRC-27 Agenda Item 1.2.

➤ **Updating our satellite authorization framework.**

Eutelsat Group supports Ofcom's objective to review and potentially update the applicable licensing framework for NGSO satellite services and the Satellite Gateway License fees policy. Maintaining a clear, transparent and flexible licensing framework that takes account of technological developments and innovations is key for the fast-evolving satellite sector. Similarly, the implementation of a reasonable regulatory fees policy is vital in ensuring long-term investments and supporting the expansion and growth of the satellite sector, facilitating the take up of satellite technology in the UK.

Eutelsat Group urges Ofcom to keep the regulatory fees low, especially for cases where satellite operators offer B2B services to help connect businesses like MNOs' base stations in rural/remote areas, ships, vessels, emergency services, governmental services, etc. Notably, for this type of B2B applications, satellite operators often deploy a few hundred or less than a thousand of terminals. This model differs fundamentally from the B2C scenario, whereby satellite operators serving the consumer market directly might deploy hundreds of thousands or more terminals in the UK.

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	<p>Moreover, Eutelsat Group would like to kindly suggest the following distinction with regards to the regulatory treatment of different actors:</p> <p>For satellite operators that provide B2B services, like Eutelsat-Oneweb, Ofcom should consider separating the requirement for a Network Licence for network-related operations in the UK, from the need for a blanket license - authorizing the use of spectrum - which should be linked (issued or exempted) to the service provider offering end-user services in the UK.</p> <p>The separation and differentiated regulatory treatment of these two stakeholders, i.e. satellite operator from satellite service provider, is essential to assign regulatory, business and legal responsibilities appropriately.</p> <p>Lastly, Eutelsat Group supports updating the national procedure for the management of satellite filings to reflect the outcomes of the last two WRCs and remains available to provide input to any future consultation on the above subjects.</p> <p>**</p> <p>On a final note, Eutelsat Group appreciates Ofcom's commitment to safeguarding the satellite industry's spectrum needs and, even more so, to making more spectrum available to enable innovative satellite applications. What is more, adopting a regulatory framework and licensing conditions that recognize the particularities of satellite systems (both GSO and NGSO) is key for the satellite industry to grow.</p> <p>Eutelsat Group is committed to supporting Ofcom in achieving its identified priority of '<i>Enabling wireless services in the UK economy</i>' and ensuring availability of radio spectrum to support growing demand for satellite services and applications. We remain at Ofcom's disposal for further engagements.</p>

Please complete this form in full and return to [planofwork@ofcom.org.uk](mailto:planofwork@ofcom.org.uk)