

Your response

Question	Your response
<p>Question 1: Do you have any comments on Ofcom's proposed Work Plan for 2025/26?</p>	<p>Confidential? – N</p> <p>Rivada Space Networks (“Rivada”) thanks Ofcom for the opportunity to provide feedback to their proposed Plan of Work 2025/26. We appreciate Ofcom’s transparency and trust shown to the public with this consultation.</p> <p>For a continued growth of the booming satellite industry sector, especially the solutions provided by non-geostationary orbit (NGSO) satellite operators, spectrum availability and its effective use are key. We thus strongly agree with Ofcom’s assessment that they as the UK’s key authority for spectrum matters, play a crucial role in enabling and supporting the further development of the sector.</p> <p>We are pleased to have seen Ofcom’s actions that attest to that in the past years in particular in the last year’s consultation “Increasing use of the 27.5 – 30 GHz band” which focused on ensuring effective usage of 28GHz band and proposals of authorizing the use of land-based satellite user terminals in parts of spectrum that was returned by Arqiva¹. We look forward to the outcome of the consultation and hope our proposals of making the currently unavailable portions of the 28GHz band, available for the use by user terminals communicating with satellite systems, and not gateways, as well as fully allocated to fixed satellite service instead of fixed links, have been included. Not all satellite systems require the use of gateways; however, all satellite operators depend on the availability of spectrum for user terminals. Furthermore, the current fragmentation of the band into parts for exclusive use by fixed links, and shared spectrum used by satellite networks, prevents the most efficient use of spectrum.</p> <p>To best support the spectrum needs of the satellite sector and foster the current and upcoming services like Ofcom states will be the focus in points 1.2, 1.7. and 2.28 we reiterate our belief expressed in previous consultations² to</p>

¹ [Statement and consultation: Increasing use of the 27.5 – 30 GHz band - Ofcom](#)

² As stated in our responses to the “Increasing use of the 27.5 – 30 GHz band” consultation in May and October 2024. Additionally In the past Rivada has expressed a wish for Ofcom to make more of the 27.5 – 30.0 GHz band available for satellite user terminals in our responses to “[Expanding spectrum access for satellite gateways in the 28 GHz band](#)” in September 2023 and the answer to the “[Ofcom’s proposed Plan of Work 2024/25](#)” in December of 2024. In both responses we requested Ofcom to enable the use of these frequencies for uncoordinated and licence exempt use of user terminals as a part of the ESN licence.

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	<p>the topic that the newly available spectrum should be fully allocated to FSS and satellite user terminals.</p> <p>In addition to stationary land-based satellite user terminals, aeronautical and maritime Earth stations in motion (ESIMs) enable continuous and reliable connectivity along maritime and aerospace travel routes, especially in areas that are out of reach of terrestrial networks (users on ships sailing through and airplanes flying over the oceans for example)³. To that we support Ofcom's plan to open a public consultation on granting additional access to Ka band for satellite terminals on ships and planes as presented in points 2.31 and Project Annex⁴, and look forward to contributing to it.</p> <p>In point 2.32 and Project Annex⁵, Ofcom states they intend to review the satellite licensing for NGSO systems. We appreciate Ofcom's commitment to keeping their legislation up to date and look forward to reviewing the updates to the current NGSO licensing framework once the document gets published.</p>

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