



Via Electronic Mail

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Anguilla Public Utilities Commission
Attn: Mr. Damien T. Harrigan, Executive Director
Hansa Building II – Unit 1
PO Box 1400 The Valley
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RE: Comments on Public Notice 2026-2 — Consultation on Satellite Spectrum and Licensing Framework, Including NGSO Broadband, Direct-to-Device Services and Satellite Earth Stations

Amazon Leo¹ appreciates the opportunity to submit comments in response to the Anguilla Public Utilities Commission's (the "Commission") Public Notice 2026-2.² Amazon Leo commends the Commission for developing a modern, forward-looking satellite framework, and supports its stated principles of flexibility, transparency, non-discrimination, technological neutrality, investment-friendliness, and innovation.

I. Background

Amazon Leo is deploying a global constellation of low-Earth orbit, non-geostationary satellite orbit ("NGSO") Fixed-Satellite Service ("FSS") satellites to deliver affordable, high-speed broadband to unserved and underserved communities worldwide. Amazon Leo began launching its constellation in April 2025 and has committed to invest over US\$10 billion in the system. Amazon Leo is building on that broadband foundation with direct-to-device connectivity and earth-station-in-motion services, forming a unified network spanning fixed and mobile satellite services. Amazon Leo looks forward to bringing resilient broadband, direct-to-device connectivity, and earth-station-in-motion services to Anguilla and the wider Caribbean, and offers the following comments in the constructive spirit of the Commission's stated objectives.

¹ Kuiper Systems LLC is a wholly owned subsidiary of Amazon.com Services LLC (collectively, "Amazon"). On November 13, 2025, Amazon replaced the Project Kuiper code name with Amazon Leo, its permanent brand for its satellite broadband network.

² Public Notice 2026-2, Consultation on Satellite Spectrum and Licensing Framework, Including NGSO Broadband, Direct-to-Device Services and Satellite Earth Stations (July 6, 2026) ("Public Notice 2026-2")

II. Blanket / Class Licensing of User Terminals and ESIMs

Amazon Leo welcomes the draft Licence provision under which end users are not required to obtain separate licences for authorised NGSO User Terminals. Amazon encourages the Commission to confirm and build on that approach as part of its proposed satellite licensing framework (Question 9). Blanket, or class, authorisation of technically identical, type-approved terminals is the international norm for NGSO FSS terminals. It allows a single authorisation to cover an unlimited number of identical terminals and significantly reduces administrative burden for regulators and operators alike. It accelerates deployment, and ensures consumers benefit from rapid service availability.³

Building on that principle, Amazon Leo recommends a tiered approach calibrated to risk. A blanket licence approach makes sense where the antennas are identical or where spectrum is exclusively assigned to satellite and no coordination is required. Individual, site-specific authorisation makes sense where coordination with terrestrial services is genuinely necessary (for example, certain gateway or Telemetry, Tracking, and Command (“TT&C”) stations). Critically, within the blanket-licensed category, no further distinction should be drawn between fixed customer terminals and Earth Stations in Motion (“ESIM”) terminals that share the same hardware and radiofrequency characteristics. Amazon Leo therefore respectfully recommends that a single blanket authorisation cover fixed customer terminals and all ESIM types, rather than a separate authorisation and fee for each service or ESIM type (Question 19)—an outcome that would add cost and administrative friction without any corresponding regulatory benefit, and that sits in tension with the Commission’s stated principles of non-discrimination and investment-friendliness.

III. Earth Stations in Motion (“ESIM”)

Consistent with the blanket-licensing approach above, Amazon Leo urges the Commission to authorise all three ESIM types—maritime, aeronautical, and land—under a common framework which is consistent with the international framework (Question 9) and uses service type definitions rather than restricting ESIM to specific frequency sub-bands. Amazon further sees no need for an in-country infrastructure requirement. Because the radiofrequency environment does not change based on whether a terminal is installed on a building, ship, aircraft, or vehicle, ESIM terminals sharing the same technical characteristics warrant the same streamlined treatment as fixed terminals. To accelerate deployment, visiting-ESIM authorisation should likewise be light-touch and notification-based.⁴

³ CITEL Recommendation PCC.II/REC. 68 (XLIII-24), *Guidance for Blanket Licensing Regimes for Ubiquitously Deployed Fixed Satellite Service (FSS) Earth Stations* (2024) (providing guidance on blanket licensing for ubiquitously deployed FSS earth stations, including earth stations in motion (“ESIM”) and very small aperture terminals (“VSATs”)); see also CITEL Recommendation PCC.II/REC. 12 (VI-05), *Procedures and Guidelines for Block or Generic Licensing for Earth Stations Operating in Frequency Bands Not Shared With Other Systems* (2005); CITEL PCC.II/DEC. 243 (XLV-25), *To Establish a Rapporteurship and Approve a Questionnaire to Collect Information on Blanket Licensing Regimes for Ubiquitously Deployed Fixed Satellite Services (FSS) Earth Stations, Including Earth Station in Motion (ESIM) and Very Small Terminal (VSAT)* (2025).

⁴ ITU-R Resolution 123 (WRC-23), Use of the frequency bands 17.7-18.6 GHz, 18.8-19.3 GHz and 19.7-20.2 GHz (space-to-Earth) and 27.5-29.1 GHz and 29.5-30 GHz (Earth-to-space) by aeronautical and maritime earth stations in motion communicating with non-geostationary space stations in the fixed-satellite service; see also ITU-R Resolution 121 (WRC-23), Use of the frequency band 12.75-13.25 GHz by earth stations in motion on aircraft and vessels communication with geostationary space stations in the fixed-satellite service; CITEL Recommendation

This is not a theoretical concern: aeronautical ESIM capabilities are already generating significant commercial demand. That demand is immediate and concrete: under a publicly announced agreement, Amazon Leo will begin connecting an initial 500 Delta Air Lines aircraft in 2028.⁵ Amazon Leo looks forward to bringing the same service to airlines and vessels that serve Anguilla.

IV. Direct-to-Device (“D2D”) Services

Amazon Leo supports the Commission’s inclusion of D2D, which is complementary to terrestrial service: it expands coverage and delivers resilience when terrestrial networks are unavailable or disrupted—a benefit of particular value to an island and islets exposed to hurricane-season outages. To realise that benefit, the Commission should preserve the distinction between two different approaches that the term “D2D” can describe. D2D delivered over International Mobile Telecommunications (“IMT”) (terrestrial mobile) spectrum is best addressed through a market-based, supplemental-coverage approach, operating with the consent of the relevant IMT spectrum holder. D2D delivered over dedicated Mobile Satellite Service (“MSS”) spectrum, by contrast, is governed by the MSS framework and international harmonization. These are not interchangeable, and the regulatory tools appropriate to one are not appropriate to the other.⁶

It follows that D2D services should not be reflexively subject to the full suite of interconnection and quality-of-service obligations that fall on traditional terrestrial communications services, where those obligations do not fit a supplemental satellite service (Questions 14–15). Amazon Leo supports appropriate emergency-communications capability and will work with the Commission to calibrate proportionate, technically feasible obligations for such services.

V. Licensing Framework Fit

A satellite-appropriate framework should recognise the characteristics that distinguish a global NGSO system from a terrestrial network. Amazon Leo therefore recommends that the Commission expressly carve out, from the general obligations imported by the Draft Licence,⁷ those requirements that are technically inapplicable to a globally operating NGSO system (Question 9)—rather than applying

PCC.II/REC. 27 (XIV-09), *Notification of Earth Stations Operating in the Fixed-Satellite Service (FSS) (Space-to-Earth)* (2009) (notification of FSS earth stations); ECC Decision 15(04), *The harmonised use, free circulation and exemption from individual licensing of Land, Maritime and Aeronautical Earth Stations On Mobile Platforms (ESOMPs) operating with NGSO FSS satellite systems in the frequency ranges 17.3-20.2 GHz, 27.5-29.1 GHz and 29.5-30.0 GHz* (approved July 3, 2015, amended Nov. 20, 2020).

⁵ See Amazon, *Amazon Leo to power in-flight Wi-Fi for Delta Air Lines starting in 2028* (Mar. 31, 2026), <https://www.aboutamazon.com/news/amazon-leo/amazon-leo-delta-in-flight-wifi-2028>; Delta, *Amazon Leo sign agreement to deliver next era of connected travel and digital experiences* (Mar. 31, 2026), <https://news.delta.com/delta-amazon-leo-sign-agreement-deliver-next-era-connected-travel-and-digital-experiences>.

⁶ Cf. See United States Federal Communications Commission, *Single Network Future: Supplemental Coverage from Space, Report and Order*, GN Docket No. 23-135, 39 FCC Rcd 2622 (rel. Mar. 14, 2024); ; and ISED, *Decision on Globalstar Canada’s Application for Ancillary Terrestrial Component (ATC) Authority in the 2.4 GHz Band (2483.5 2500 MHz)*, SMSE-009-20 (rel. Nov. 2020), <https://ised-isde.canada.ca/site/spectrum-management-telecommunications/sites/default/files/attachments/2022/SMSE-009-20-2020-11EN.pdf> (“ISED 2020 Globalstar Decision”) (authorizing ATC components to operate below 2495 MHz).

⁷ Draft NGSO Satellite Network Licence for Internet Services, cl. 3.11.

terrestrial licensing models to satellite, which would sit uneasily with the Commission’s own principle of technological neutrality.

Amazon Leo is pleased to note that other features of the draft Licence reflect an investment-friendly orientation. In particular, Amazon Leo welcomes the ten-year licence term with successive, quasi-automatic ten-year renewals.⁸ Amazon also endorses long, predictable, renewable terms to provide the certainty that encourages the substantial capital investment satellite deployment requires.

VI. Fees

Amazon Leo respectfully recommends that all licence and spectrum-authorisation fees be limited to the administrative cost of processing and managing authorisations (Questions 18 and 19), rather than set as revenue-based charges or accumulated as separate fees for each service or ESIM type. NGSO and D2D systems require substantial upfront capital before generating any revenue, and cumulative per-service or per-country fees can function as a barrier to entry—reducing affordability for the consumers the framework is intended to serve. Cost-based fees, by contrast, promote competition by allowing operators to compete on service quality and price rather than regulatory cost, and thereby directly benefit end users.

VII. Market Access and Local Presence

Amazon Leo’s overarching aim is a single, streamlined pathway to authorisation. Requiring Landing Rights for a satellite system already licensed by its home administration is unnecessary. To the extent the framework would require a separate Landing Rights authorisation (Question 9), Amazon Leo respectfully recommends against introducing a distinct layer that adds delay and cost without a corresponding regulatory benefit, and instead encourages the Commission to fold any landing-rights function into a single authorisation. The same reasoning applies to local presence requirements. Regulatory frameworks that reduce barriers to foreign satellite participation drive innovation and result in increased choice, lower prices, and higher quality of service for consumers.⁹

Accordingly, Amazon Leo encourages the Commission to minimise local-presence requirements consistent with the global nature of satellite operations, and to accept alternative accountability mechanisms—such as the appointment of a local regulatory representative to accept service of process, contractual accountability arrangements, or registration with the Commission without local incorporation—in lieu of mandatory local incorporation.¹⁰ These alternatives provide the Commission with effective enforcement and accountability while recognising how global satellite systems operate in practice.

VIII. Additional Matters

⁸ *Id.* at cl. 4.1–4.3.

⁹ See GSOA, Response to the URCA Framework for Satellite-based Services (Bahamas) (Jan. 2025) (noting CITEL’s recommendation that member states, “[t]o the extent allowed by national laws, [] minimize local presence requirements in-country.”); see also CITEL Recommendation PCC.II/REC. 6 (II-03), Guidelines for the Implementation of National Regulations that Facilitate the Deployment of Satellite Services, Particularly Broadband Services, in the Americas (2003).

¹⁰ Draft NGSO Satellite Network Licence for Internet Services, cl. 3.22; Public Notice 2026-2, § 24.

Amazon Leo offers the following observations on the remaining proposals, each consistent with the principles set out above. On coexistence and interference (Questions 3, 6, and 7), Amazon Leo is confident it can coexist with terrestrial services using the existing coordination mechanisms of the International Telecommunication Union (“ITU”) Radio Regulations. Any Anguilla-specific interference assessment the Commission may adopt should therefore be proportionate to actual risk and should avoid duplicating obligations that already apply under the Radio Regulations.

On the higher-frequency bands (Questions 16 and 17), Amazon Leo has no objection to the Commission’s proposed Ofcom-aligned conditions for the E-band, nor does Amazon object to making the W-band available for gateway feeder links on a no-interference, no-protection basis.

Finally, the Commission proposes to reserve the right to modify power limits and elevation angles on 30 days’ notice.¹¹ While Amazon Leo appreciates the need for the Commission to retain flexibility, that right should, in fairness to deployed systems, be exercised only after prior consultation with affected operators and with a reasonable transition period and grandfathering of compliant existing deployments except where an urgent, evidenced interference problem requires more immediate action. This balance preserves the Commission’s oversight while protecting the service continuity on which Anguillian consumers would come to rely.

IX. Conclusion

Amazon Leo expresses its gratitude to the Commission for the opportunity to comment on Public Notice 2026-2, and commends the Commission’s effort to establish a clear, forward-looking satellite framework. The recommendations above are offered in support of that goal—a framework that is flexible, technology-neutral, and investment-friendly, and that positions Anguilla to realise the full benefits of satellite connectivity. Amazon Leo welcomes the opportunity for further dialogue on these important issues.

Respectfully submitted,

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On behalf of Kuiper Systems LLC

¹¹ Draft NGSO Satellite Network Licence for Internet Services, cl. 3.15.; Public Notice 2026-2, § 23.