

14 August 2026

Public Utilities Commission of Anguilla

Re: Consultation on Satellite spectrum and Licensing Framework, Including NGSO Broadband, Direct-to-Device Services and Satellite Earth Stations

Dear PUC,

The GSMA appreciates the opportunity to help inform PUC's work on the future of D2D regulation in Anguilla.

The GSMA believes that, with the right regulation, the use of satellite connectivity as part of a mobile network can supplement a terrestrial operator's network coverage. D2D infrastructure can also provide an added layer of network resilience as signals from satellites can still be received in the event of terrestrial network outage, including support for emergency services where terrestrial networks fail.

As highlighted in the consultation document, D2D operations can use two spectrum categories: frequency bands allocated to the mobile service and identified for IMT, or bands already allocated to MSS. The benefit of using MSS spectrum is because it already carries harmonised technical and regulatory rules at the International Telecommunications Union (ITU). A number of countries have, or are considering, regulatory frameworks for D2D in MSS bands. Today, however, only a limited number of high-end handsets can operate in MSS bands. In contrast, standard handsets can use IMT spectrum for D2D. This requires commercial agreements between mobile network operators (holders of the terrestrial spectrum licences) and satellite network operators.

Any new MSS allocation in mobile bands, in response to WRC-27 Agenda Items, must protect IMT against harmful interference. Furthermore, if MSS-based service providers offer service directly to the end user without partnering with the terrestrial MNO, it needs to comply with the same set of licensing, security and consumer-protection obligations, including, lawful interception, KYC, etc., as the terrestrial mobile operators.

Regardless of the spectrum used, D2D's largest obstacle is its technical limitations. The larger footprint of satellite beams compared to terrestrial cells limits the amount of data that can be delivered in any area. Free space path loss is also significantly higher, and these two factors impact network quality.¹ Therefore, D2D use will be limited in densely populated areas and indoors.

Considering that the typical cell radius for D2D cells ranges from 30 to 50km, a single cell would cover the entire island of Anguilla (which is less than 30km end to end) and potentially present an interference risk to the neighbouring island to the south of Anguilla.

In addition, D2D authorisation should only be used as one aspect of improving connectivity in Anguilla in providing a low-bandwidth coverage layer. Policies which improve the reach of terrestrial mobile by encouraging network investment should also be pursued to enhance coverage, while closing the usage gap (those who live within the footprint of a mobile network but do not use it) requires a focus on harmonisation and affordability.²

¹ [The Limits of D2D: Modelling the extent of D2D connectivity](#), GSMA, 2026.

² [Spectrum for D2D Public Policy Paper](#), GSMA, 2025.

Response to question 11: Do respondents agree that MNOs should be permitted to provide satellite services using spectrum already assigned to them? If not please explain why not with justifications.

This response outlines the GSMA's views in relation to MNOs using their spectrum to provide D2D services. The GSMA agrees that MNOs should be permitted provide D2D services using spectrum already assigned to them and to deploy them in partnership with satellite operators.

Regulators should not grant separate licences to D2D operators for the same frequencies and areas as existing terrestrial licences. This would undermine the regulatory ecosystem currently supporting mobile terrestrial infrastructure investment and services for billions of consumers. Access to MNO spectrum for D2D should derive from the MNO licence rights, not any separate licence from the regulator. The MNO licensee must provide consent to the satellite operator via a lease agreement or similar commercial transaction. The D2D satellite entity will need satellite authorisations to operate their constellations but its rights of use of terrestrial MNO spectrum licences should derive from the rights of the MNO.

WRC-27, under Agenda Item 1.13, will endeavour to agree internationally harmonised parameters to ensure coexistence between terrestrial mobile and D2D services when using adjacent frequencies or using the same frequencies in adjacent areas.

Where countries wish to provide a framework, regulations should ensure both the compatible operation of D2D in one spectrum block next to terrestrial mobile in the adjacent spectrum block, and that terrestrial mobile operating in one licensed geographic location is protected from D2D in a neighbouring licensed geographic location.

Satellite Licensing Framework: Regulatory Considerations

The GSMA welcomes PUC's clear and forward-looking approach on a licensing framework. A regime that is flexible, transparent, proportionate, non-discriminatory, and technologically neutral will support the rapid deployment of satellite connectivity while fostering competition and innovation.

This is very much aligned with our global position paper titled: "Regulatory Preparedness for Satellite Services- Direct-to-users LEO connectivity services, March 2026"³. Emphasising the need for regulatory alignment between satellite and mobile, this paper suggests five core principles, ensuring that the policies that evolve support operators of both technologies fairly, in the best interests of consumers. These principles are outlined in more detail in the paper and summarised as below:

1. **Transparency and Predictability:** Establish clear, consistent, and accessible rules for market entry so that both new satellite entrants and existing mobile operators can make confident, long-term investment decisions together.
2. **Regulatory Parity:** Maintain a level playing field by ensuring that satellite providers face the same legal and regulatory obligations as mobile operators.
3. **Harmonisation:** Align regional and international policies to reduce fragmentation and enhance regulatory efficiency.
4. **Collaboration and Consultation:** Maintain an open dialogue between all stakeholders to ensure that new policies are evidence-based, inclusive of all stakeholders and reflect current market realities.

³ [Regulatory Preparedness for Satellite](#), GSMA, 2026.

5. **Balance Innovation with Regulation:** Encourage technological progress while maintaining compliance, consumer protection and national security to build trust.

We therefore are in strong agreement with Commission's proposed objectives and principles for satellite regulation in Anguilla.

Where satellite services are delivered through partnerships with terrestrial network operators, we believe that the established regulatory frameworks could typically provide sufficient safeguards. In contrast, where Low Earth Orbit (LEO) services are provided without such partnerships, existing policies are often less explicit or remain underdeveloped. **We would therefore want the Commission to make this clear distinction in the final recommendation.**

Lastly, we are also supportive of PUC's vision of establishing a modular satellite licensing framework. PUC wishes to adopt an approach to satellite licensing that is in tune with the needs of future regulation by making it adaptable and flexible and to allow for more rapid deployment.

In view of this, the GSMA have launched a global Satellite Regulatory Playbook⁴ in June 2026 which provides practical recommendations for regulators seeking to create harmonised, technology-neutral satellite frameworks that prioritise societal needs, consumer protection and sustainable investment.

As LEO satellite services expand globally and begin to complement terrestrial mobile and broadband networks, this Playbook would provide the Commission with a structured framework to modernise satellite regulation in ways that support societal needs, protect consumers, and encourage investment in the next generation of communications networks.

The GSMA's Satellite Regulatory Playbook focuses on emerging satellite broadband and direct-to-device (D2D) services delivered directly to end users without mobile operator partnerships, where existing regulatory frameworks often leave gaps. It identifies eight key regulatory pillars that policymakers should consider when developing or modernising frameworks for satellite services:

- Local establishment rules
- National security
- Consumer protection and operational measures
- Infrastructure and facility requirements
- End-user terminal deployment
- Fiscal considerations
- Emergency services and public safety
- Enforcement

We noted that the Commission in the paper has already identified some of these aspects like local legal presence, type approval etc. **We sincerely hope that the Commission can draw on other regulatory elements from the playbook that are relevant for Anguilla and adopt in its recommendations.**

We hope these comments are helpful and would be pleased to answer any further questions or meet if useful.

⁴ [Satellite Regulatory Playbook](#), GSMA, 2026.



Yours sincerely,

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