

GSOA Contribution to Anguilla Satellite Consultation (PN 2026-2)
"Consultation on Satellite Spectrum and Licensing Framework, Including NGSO
Broadband, Direct-to-Device Services and Satellite Earth Stations"

I. Introduction

GSOA appreciates the opportunity to provide comments on the Anguilla Satellite Consultation (PN 2026-2). GSOA welcomes the Commission's initiative to develop a modern, flexible and forward-looking framework for satellite spectrum access, licensing and authorization in Anguilla.

Satellite services are essential to expanding broadband connectivity, strengthening network resilience, supporting maritime and aeronautical mobility, enabling emergency communications, and promoting competition and innovation. These benefits are particularly important for island territories, where satellite networks can complement terrestrial infrastructure and provide reliable connectivity across communities, vessels, aircraft, enterprises and public services.

GSOA respectfully encourages the Commission to adopt a regulatory framework that is technology-neutral, non-discriminatory, proportionate and aligned with the ITU Radio Regulations, the CITELE Technical Notebook on Satellite Regulatory Frameworks and Best Practices, and other relevant international best practices. Such a framework should facilitate access for both GSO and NGSO systems, avoid duplicative local requirements where international coordination already applies, preserve spectrum access for key satellite applications including ESIM, gateway and feeder-link operations, and ensure that emerging services such as D2D, D2C, IoT and M2M do not adversely affect existing and future satellite services.

GSOA provides below its responses to the questions raised in the consultation.

II. Responses to Consultation Questions

Question 1: Do respondents agree with the Commission's proposed objectives and principles for satellite regulation in Anguilla?

GSOA strongly supports the Commission's proposed objectives, particularly:

- technology neutrality;
- regulatory flexibility;
- promotion of innovation;
- encouragement of investment;
- spectrum efficiency;
- non-discriminatory treatment of operators; and
- reliance on internationally harmonized regulatory frameworks.

GSOA recommends that the Commission explicitly recognize that satellite systems are inherently global networks operating pursuant to internationally coordinated spectrum and orbital resources

under the ITU framework. Licensing and market access frameworks should therefore avoid imposing duplicative national regulatory requirements where equivalent obligations have already been satisfied through the relevant notifying administration and ITU processes.

Further, GSOA encourages the Commission to keep and implement an “open skies” regime to ensure non-discriminatory access for both domestic and non-domestic operators¹. These mechanisms can help streamline the ability of users to access satellite connectivity and minimize the administrative and regulatory burdens for both regulators and satellite operators.

GSOA also recommends that the Commission adopt blanket authorisation as a guiding principle of the framework, consistent with CITEC Recommendation PCC.II/Rec. 6 (“Guidelines for the Implementation of National Regulations that Facilitate the Deployment of Satellite Services, Particularly Broadband Services, in the Americas”), which is widely recognized across the region as a facilitator of rapid user-terminal deployment and technologically neutral spectrum access.

Question 2: Should the Commission prioritize particular satellite use cases?

The Commission should avoid establishing rigid policy priorities among satellite services. Different use cases produce distinct societal and economic benefits, including:

1. Broadband connectivity;
2. Disaster resilience and emergency communications;
3. Maritime connectivity;
4. Aviation connectivity;
5. Mobile backhaul;
6. Enterprise and government connectivity;
7. IoT and M2M applications; and
8. Direct-to-device services.

The licensing framework should remain technology-neutral and demand-driven, allowing market forces and consumer needs to determine service deployment priorities.

Question 3: Do respondents believe that there is any significant risk from interference between the satellite bands proposed and terrestrial services or any other interference. If so, what mitigating measures are necessary beyond what is already stipulated in the Radio Regulations and 3GPP NTN standards?

GSOA does not believe additional Anguilla-specific interference mitigation measures are generally required beyond the ITU Radio Regulations, international coordination processes and applicable 3GPP NTN specifications.

¹ See GSOA, GSOA Comments on the UCC Framework for Satellite Communications-2021, Uganda Communications Commission at 3, <https://gsoasatellite.com/wp-content/uploads/2022-01-28-GSOA-Contribution-UCC-Framework-for-Satcom.pdf> (noting that “open skies” regimes allow satellite operators to provide capacity internationally without seeking landing rights).

The existing international framework has been specifically developed to facilitate coexistence among satellite systems and terrestrial services globally.

In GSOA's view, additional national technical requirements should only be imposed where evidence demonstrates a genuine and unique local interference risk not already addressed by international regulations.

Question 4: Do you agree with these Ku-band and Ka-band proposals? If not, please provide alternative proposals with justifications.

GSOA supports the proposed use of Ku- and Ka-band frequencies for satellite broadband services. These bands represent globally harmonized satellite spectrum resources and are extensively used by both GSO and NGSO satellite systems. Given their significant value for existing and future GSO applications, GSOA respectfully encourages the Commission to ensure that GSO and NGSO systems are afforded fair, technology-neutral and non-discriminatory access to spectrum, subject to applicable ITU coordination and interference-protection requirements. The Commission should therefore ensure:

- technology-neutral access;
- non-discriminatory treatment of GSO and NGSO systems in licensing, coordination, and spectrum access conditions;
- conformity with ITU allocations and coordination status;
- avoidance of exclusive spectrum assignments where international sharing frameworks already exist.

Moreover, GSOA encourages the Commission to consider implementation of Resolution 121 (WRC-23) for the operation of maritime and aeronautical ESIM communications with GSO systems in the Ku-band, Resolution 123 (WRC-23) for the operation of maritime and aeronautical ESIM communications with NGSO systems in the Ka-band, and Resolutions 156 (WRC-15) and 169 (WRC-19) for the operation of maritime and aeronautical ESIM communications with GSO systems in the Ka-band.

Additionally, the allocation of the 17.3-17.7 GHz band to FSS will significantly expand the capacity for high-speed satellite broadband services. This move supports global spectrum harmonization efforts and meets the increasing demand for robust internet connectivity.

Question 5: Do you agree with the proposed V, E and W band allocations and the terms on which they can be used, or are there other uses to which some of this spectrum should be put such as terrestrial microwave to the exclusion of satellite services? Provide justification for your answers.

GSOA supports making V-band, E-band and W-band frequencies available for satellite services. These bands are expected to play an increasingly important role in supporting future satellite capacity, gateway deployment, feeder and service links, and next-generation connectivity services.

GSOA respectfully encourages the Commission to adopt a flexible, technology-neutral approach that preserves the ability of both satellite (i.e. GSO and NGSO) and terrestrial systems to access these bands, where compatible with applicable ITU allocations, coordination procedures, and future WRC outcomes. In GSOA's view, spectrum should not be designated for terrestrial microwave use to the exclusion of satellite services where coexistence, sharing, or coordinated use is technically feasible.

Any authorization framework for these bands should avoid unduly restrictive conditions and should allow operators sufficient flexibility to deploy future technologies as international rules and market needs evolve. Temporary or interim authorizations pending relevant WRC-27 outcomes should be administratively straightforward and should not prevent the future introduction or expansion of satellite services in these bands.

GSOA also recommends that, within V-band, the Commission allow licensees to access wider, contiguous bandwidth blocks rather than the narrow, fragmented sub-bands set out in the proposed table. Narrow, fragmented channels increase guard-band overhead and constrain gateway throughput. GSOA suggests that the Commission consider contiguous block assignments, consistent with the approach adopted by the FCC for NGSO V-band gateway earth stations, in order to optimize spectrum use and support high-quality feeder-link service.

Question 6: Are there existing terrestrial fixed links, mobile networks, broadcasting systems, government systems, aviation/maritime systems or other services in Anguilla that may be affected by use of the proposed satellite bands? Please identify the frequencies, locations, technical characteristics and likely interference mechanisms.

GSOA is not aware of specific Anguilla services requiring additional protections beyond existing international mechanisms. However, GSOA respectfully encourages the Commission to ensure that any existing or future terrestrial, mobile, broadcasting, government, aviation/maritime systems or other services operating in or adjacent to the proposed satellite bands are assessed carefully to avoid harmful interference to or from satellite services operating in those bands.

Satellite applications rely on predictable access to internationally harmonized spectrum and should continue to be protected in accordance with the ITU Radio Regulations, applicable coordination procedures, and relevant technical standards.

Regulatory obligations or mitigation measures should remain proportionate to demonstrated risks and should not impose unnecessary burdens on satellite operators or limit the future deployment of satellite-enabled services where coexistence is technically feasible.

Question 7: Should the Commission require satellite applicants to submit an Anguilla-specific interference assessment before authorization? If so, what should that assessment include?

GSOA respectfully submits that the Commission should not require Anguilla-specific interference assessments as a mandatory condition for all satellite authorizations. Internationally coordinated satellite systems are already subject to extensive technical analyses through their notifying administrations, the ITU Radio Regulations, and applicable international coordination procedures.

Requiring duplicative local studies for routine market-access applications could create unnecessary administrative burdens without materially improving interference protection. Any additional assessment should therefore be proportionate, evidence-based, and limited to circumstances where a specific local risk has been identified.

In particular, additional information should only be requested where site-specific gateway earth stations or other fixed facilities are proposed, or where credible evidence indicates a genuine and unique local interference risk not already addressed by international coordination procedures.

Where such an assessment is justified, it should be narrowly tailored to the relevant frequencies, geographic area, technical parameters, and affected services. The Commission should avoid requiring broad or generic studies and should accept, where appropriate, existing ITU filings, coordination materials, link budgets, technical parameters, and other information already prepared for international or national licensing purposes.

This approach would preserve an appropriate level of interference protection while avoiding disproportionate requirements that could delay market entry, duplicate existing international analyses, or discourage the deployment of satellite services in Anguilla.

GSOA also recommends that the framework avoid conditioning authorisation on requirements that a gateway be located within Anguilla's territory, or that data processing be carried out locally, as such conditions would not provide any additional regulatory benefit beyond the coordination mechanisms already available and would impose a disproportionate burden relative to the risk presented.

Question 8: Should gateway earth stations (larger stations that aggregate traffic rather than being user specific) be subject to site-specific coordination zones, exclusion zones, registration, public notice, or coordination with neighbouring jurisdictions before deployment?

GSOA recognizes that gateway earth stations may warrant site-specific technical review, given their fixed location and operational characteristics. However, any requirements for coordination zones, exclusion zones, registration, public notice, or coordination with neighboring jurisdictions should be proportionate, evidence-based, and limited to what is necessary to address demonstrated interference risks.

In GSOA's view, gateway earth stations should not, absent demonstrated need, be subject to blanket exclusion zones or overly burdensome public notice procedures. Instead, the Commission should rely on established technical coordination processes, ITU Radio Regulations, applicable coordination procedures, and relevant international best practices to assess potential interference on a case-by-case basis.

Where coordination with neighboring jurisdictions is technically necessary, such coordination should be focused on the relevant frequencies, technical parameters, and geographic circumstances of the proposed gateway site. The process should be transparent, predictable, and completed within reasonable timeframes so that gateway deployment is not unnecessarily delayed.

GSOA respectfully encourages the Commission to adopt a light-touch registration or notification framework for gateway earth stations, supported by site-specific technical information where appropriate, while avoiding duplicative or disproportionate obligations that could discourage investment in satellite infrastructure.

Question 9: Do you agree with this framework for satellite licensing and authorization? If you have alternative proposals, please provide explanations and justifications.

GSOA welcomes the Commission's objective of developing a modern, transparent and flexible satellite licensing and authorization framework. However, GSOA, in line with the CITEC Technical Notebook on Satellite Regulatory Frameworks and Best Practices, respectfully recommends that the framework be revised to more clearly reflect an open skies approach to satellite market access. Such an approach would allow duly authorized satellite operators and service providers to offer services in Anguilla on a transparent, non-discriminatory and technology-neutral basis, while avoiding unnecessary local licensing layers or duplicative requirements where equivalent authorizations, ITU coordination and international obligations already apply.

Satellite networks are inherently global and operate under the ITU Radio Regulations and the oversight of their relevant licensing or notifying administrations. For that reason, local authorization processes should facilitate access to satellite capacity and services, rather than create additional barriers to entry or require satellite operators to re-demonstrate matters already addressed through international coordination or home-administration licensing processes.

Accordingly, GSOA encourages the Commission to consider GSOA's Satellite Licensing Best Practices and to adopt a light-touch market-access model based on the following principles:

- **Open skies market access:** permit foreign-licensed and internationally coordinated satellite systems to provide satellite capacity and services in Anguilla through a simple notification, registration or market-access authorization, rather than requiring full duplicative local satellite licensing. In particular, satellite operators providing space

segment capacity to duly authorized local telecommunications operators or service providers should not be required to obtain a separate local license solely for the provision of such capacity.

- **Eliminate the requirement to establish a local entity:** such a requirement is unnecessary and creates a significant barrier to the provision of satellite capacity, which by its nature extends beyond national borders, while potentially limiting competition and market access.
- **Technology- and orbit-neutral treatment:** apply transparent and non-discriminatory rules to GSO, NGSO and other satellite technologies, without preference for any particular architecture or operator category.
- **Reliance on existing authorizations:** accept, where appropriate, evidence of licensing, technical compliance, ITU filings, coordination status and relevant approvals already granted by the operator's licensing or notifying administration.
- **Proportionate local requirements:** limit Anguilla-specific obligations to matters that genuinely require local oversight, such as consumer protection, lawful operation in Anguilla, emergency coordination where applicable, and site-specific review for gateway earth stations or other fixed facilities.
- **Predictable timelines and fees:** ensure that any registration, notification or spectrum authorization process is transparent, time-bound, cost-based and proportionate to Anguilla's market size and the shared nature of satellite spectrum.

GSOA further recommends that the Commission distinguish between the authorization of satellite networks and service providers, the use of user terminals and ESIMs, and the deployment of gateway or other high-power fixed earth stations. Routine user terminals and ESIMs should be subject to general authorization, licence-exemption or simplified registration where consistent with applicable technical parameters. By contrast, gateway earth stations and other fixed facilities may justify site-specific review where necessary to address demonstrated local interference, siting or coordination issues.

This framework would preserve the Commission's ability to exercise appropriate regulatory oversight while reducing unnecessary administrative burdens, supporting competition and innovation, and facilitating access to global satellite capacity. It would also be particularly suitable for a small island market such as Anguilla, where satellite services can play an important role in improving broadband availability, network resilience, maritime and aeronautical connectivity, and emergency communications.

Question 10: Do you agree with the information requirements for applications for large and high-power earth stations?

GSOA generally agrees that applications for large or high-power earth stations, particularly gateway earth stations and other fixed facilities, may appropriately include site-specific technical information where such information is necessary to assess compatibility with existing services and manage demonstrated interference risks.

However, such requirements should remain proportionate, targeted and technically justified. The Commission should distinguish large and high-power earth stations from routine user terminals, ESIMs or other low-power earth stations, which should remain subject to general authorization, license-exemption, blanket licensing or simplified registration where consistent with applicable technical parameters.

For large or high-power fixed earth stations, reasonable information requirements may include location, antenna characteristics, frequency bands, emission parameters, EIRP, elevation and pointing information, operational parameters, and relevant coordination information. The Commission should not require broader information than is necessary for its technical review, and should accept equivalent technical materials already prepared for ITU coordination, home-administration licensing, or other recognized regulatory processes where appropriate. GSOA recommends that such information requirements be limited to parameters already standardized by the ITU-R — including EIRP, antenna radiation pattern, power flux-density, and coordination/filing status — without additional requirements that duplicate matters already addressed through international processes.

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.

GSOA recognizes that direct-to-device (“D2D”) services represent one of the most significant recent developments in the satellite sector. Advances in satellite technology, together with the ongoing development and implementation of 3GPP Non-Terrestrial Network (“NTN”) standards, are enabling satellite networks to communicate directly with standard mobile devices without the need for dedicated satellite user equipment. These services can complement terrestrial mobile networks, improve network resilience, and extend connectivity to areas where terrestrial coverage is unavailable, unreliable, or temporarily impaired.

GSOA supports that both D2D using MSS spectrum and D2D using terrestrial IMT spectrum, through cooperation with mobile network operators, are complementary approaches that can expand connectivity and provide greater benefits to the users in Anguilla.

The Commission should also ensure that any such use remains consistent with the ITU Radio Regulations, applicable international and cross-border coordination obligations, 3GPP NTN specifications, and protection criteria for incumbent, adjacent-band, and existing satellite services.

GSOA further notes that the international regulatory framework for D2D services continues to evolve. Anguilla’s approach should therefore preserve sufficient flexibility to align with ongoing ITU-R studies and future outcomes of WRC-27, including any decisions that may affect spectrum use, technical conditions, coexistence requirements, and the regulatory treatment of satellite direct-to-device services.

Accordingly, GSOA encourages the Commission to avoid adopting rules that would either prevent innovative satellite-enabled mobile services or presume that terrestrial mobile spectrum can be used for satellite operations without appropriate authorization, coordination, and interference safeguards. A balanced framework should support innovation and resilience while protecting existing and future satellite and terrestrial services from harmful interference.

Question 12: Do respondents agree that these power limits are appropriate and if not what is the alternative bearing in mind the impact on service quality? Please provide justifications for your answers.

Considering the evolution of the studies being conducted within the ITU-R, the Commission should consider pfd limits per frequency band, calculated using the baseline IMT UE parameters previously defined by ITU-R Working Party 5D, namely a body loss equal to 4 dB instead of the 0 dB proposed by Ofcom, and an antenna gain equal to -3 dBi, the same value proposed by Ofcom. In several studies, these values have proven sufficient to protect the operation of terrestrial networks while enabling improved coverage for D2D services.

In addition, the limits could be expressed using a reference bandwidth of 5 MHz instead of 1 MHz, as described below:

Frequency (MHz)	dBW/M ² /5MHz
700	-108.21
800	-106.92
900	-106.21
1.500	-102.15
1900/2100	-99.95
2300	-98.13
2500	-97.16

These values provide the appropriate level of protection to terrestrial mobile networks, including terrestrial IMT, while enabling further development and wider deployment of D2D services.

Question 13: Do respondents agree that a minimum elevation angle of 10° is appropriate and if not what is the alternative bearing in mind the constraints on coverage that would result if the angle were to be made larger. Please provide justifications for your answers.

The minimum elevation angle of 10° is appropriate acceptable, consistent with Ofcom's analysis (Table 17, threshold of -127 dBW/MHz/m² at 10°). However, the Commission should consider a possible exception of 5° in coastal and maritime areas without line of sight to terrestrial base

stations, subject to automatic geofencing, to maximize coverage in low actual interference-risk scenarios.

In Anguilla, a 10-degree elevation angle may be appropriate for the majority of services. GSOA notes that for D2D services, particularly those in MSS bands, the use of omnidirectional antennas is common, and such an elevation angle would not be possible to maintain at all times (users holding a handset to their ear are almost constantly changing the angle of the antenna). Instead, MSS frequency use is designed in the Radio Regulations and national regulation to be on an exclusive basis and to observe strict power limits, coordination criteria, and other technical measures to ensure appropriate service.

Question 14: Should D2D services in shared 3GPP NTN bands outside IMT spectrum be subject to the same interconnection, quality-of-service and other obligations as terrestrial mobile services? If not, which obligations should be changed, removed or modified?

GSOA supports the application of appropriate consumer protection, transparency and public-interest obligations to D2D services in shared 3GPP NTN bands outside IMT spectrum. However, GSOA does not consider that such services should automatically be subject to the same interconnection, quality-of-service and other obligations applicable to terrestrial mobile network services.

D2D and 3GPP NTN services may have different technical characteristics, service capabilities, coverage models, latency, capacity, device constraints and deployment objectives compared with terrestrial mobile networks. In many cases, these services may initially support messaging, emergency communications, IoT, narrowband data, supplemental connectivity, or coverage in areas where terrestrial networks are unavailable or impaired. Obligations should therefore be tailored to the specific service offered and should not assume functional equivalence with terrestrial nationwide mobile broadband.

The Commission should also avoid imposing obligations that could delay deployment, increase costs, or discourage innovation in satellite-enabled mobile services, particularly where such services are intended to provide supplemental, emergency, remote-area or resilience connectivity. Instead, GSOA recommends a proportionate, technology-neutral and service-specific framework that protects users and other spectrum users while recognizing the operational realities of satellite networks.

Finally, given that 3GPP NTN standards, ITU-R studies and international regulatory treatment of D2D services continue to evolve, Anguilla's framework should remain flexible and capable of being updated to reflect future international developments, including relevant WRC-27 outcomes.

GSOA notes that this differentiated approach is consistent with comparative regulatory practice, including the FCC's Supplemental Coverage from Space framework, Ofcom's approach, and the progressive, service-specific adaptations adopted by administrations such as Brazil, Australia, New

Zealand, Canada, Costa Rica and Chile. In each case, full terrestrial mobile obligations continue to rest with the host mobile network operator, whose licence and network remain the primary point of regulatory accountability, given that the end-user device is the same terminal already licensed by that operator.

Question 15: What emergency calling obligations should apply to D2D services in Anguilla?

GSOA strongly supports leveraging D2D technology to enhance emergency services in Anguilla. To maximize this critical benefit, any obligation should recognise the technical characteristics of the technology to ensure a fit for purpose framework. The Commission is recommended to take appropriate measure to ensure availability of emergency services.

Question 16: Do you agree with our proposals for E-band? If not, please provide comments with justifications.

GSOA supports allowing the use of the E-band using the same restrictions as Ofcom until the end of December 2028 by which time further conclusions will have been drawn as a result of work at the WRC 2027.

Question 17: Do you agree with our proposals for W-band? If not, please provide comments with justifications.

GSOA supports making the W-band available to foster innovation and support future satellite capacity growth.

Given the experimental and evolving nature of W-band use, regulatory flexibility and light-touch licensing are essential. Allowing W-band use for gateway feeder links on a non-interference and non-protection basis appears reasonable, subject to market interest and taking into account the higher attenuation in tropical environments.

Question 18: Do you agree with this telecommunications licensing fee approach? If not, what are the alternatives given the existing legislative requirements?

GSOA supports cost-recovery-based regulatory funding mechanisms. Any fees should be objective; transparent; proportionate and non-discriminatory. However, it is not reasonable to require an NGSO satellite operator providing services over shared spectrum to pay annual spectrum usage fees calculated under the same methodology applied to terrestrial operators. The two types of systems make fundamentally different uses of spectrum and should not be treated as if they were economically or technically equivalent. As a result, the economic benefit derived from the authorization is substantially different.

Applying a terrestrial fee methodology to NGSO shared-spectrum operations would therefore overstate the value of the authorization, create an unjustified regulatory burden, and fail to reflect the actual nature of spectrum use. Such an approach could also discourage investment in satellite infrastructure and undermine the deployment of services intended to expand connectivity, particularly in underserved and remote areas.

The Commission should also consider that D2D services are designed to complement, rather than replace, terrestrial mobile networks. They extend connectivity to areas where terrestrial coverage is unavailable or degraded, improve network resilience during emergencies, and enhance consumer choice without requiring additional terrestrial spectrum assignments or infrastructure deployment. A licensing framework that imposes the same annual regulatory burden as that applicable to exclusive terrestrial spectrum licensees may inadvertently discourage investment in these innovative services.

A more appropriate approach is to establish a fee structure that reflects the shared and non-exclusive nature of NGSO spectrum use, recognizes the global operation of satellite constellations, and maintains regulatory proportionality while ensuring that spectrum management costs are appropriately recovered.

Moreover, the proposed annual levy is intended to recover the Commission's administrative costs rather than the value of spectrum rights. NGSO operators authorized to use shared spectrum generally require significantly less regulatory oversight than terrestrial mobile operators holding exclusive national spectrum assignments. Accordingly, any cost-recovery mechanism should remain proportionate to the regulatory effort associated with the relevant authorization.

Question 19: Do you agree with this spectrum authorization fee approach? If not, please provide alternative proposals with justifications.

GSOA generally supports the proposed approach, particularly the recognition that satellite services operate using shared spectrum and that no ongoing fees should apply to end-user terminals or devices. However, we recommend that the Commission clarify that the annual spectrum authorization fee is per authorization rather than per frequency band. NGSO satellite systems typically operate across multiple frequency bands as part of a single integrated network, and charging separately for each band could create an artificial and disproportionate regulatory burden unrelated to the Commission's administrative costs or spectrum management effort. A single annual fee per authorization would better reflect the shared, non-exclusive nature of satellite spectrum use while maintaining a simple and predictable licensing framework.

Question 20: Please provide any other comments you have on the consultation as a whole including supporting evidence where available and provide justifications.

GSOA welcomes the Commission's pragmatic and forward-looking approach to satellite regulation. The proposed framework provides a strong basis for enabling satellite connectivity in Anguilla. We encourage the Commission to continue building upon the principles of technology neutrality, proportionality, transparency and reliance on international regulatory frameworks to ensure that Anguilla remains an attractive jurisdiction for investment and innovation in satellite communications while protecting incumbent services and the public interest. GSOA appreciates the opportunity to contribute to this consultation proceeding and remains at the Commission's disposal should there be any questions about this submission.