

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

Paradise Mobile Response: Paradise Mobile strongly agrees with the Commission’s proposed objectives and principles.

Paradise is an enthusiastic supporter of satellite connectivity. We believe satellite technology has the potential to connect a substantial portion of the world’s remaining unconnected population, particularly in locations where terrestrial infrastructure is uneconomic or impractical. The continued development of NGSO broadband and direct-to-device technology is therefore an extremely positive development for the global telecommunications industry and, in our view, should be encouraged.

For Anguilla, satellite connectivity also offers important benefits in resilience, emergency communications, supplementary mobile coverage, maritime connectivity and alternative backhaul.

Paradise therefore supports a framework that is flexible, transparent, proportionate, technologically neutral and supportive of investment and innovation. We would add that technological neutrality should also preserve competitive neutrality and existing spectrum rights. Satellite technology should not provide a means of circumventing obligations applicable to similarly situated terrestrial telecommunications providers.

Most importantly, where satellite services propose to use spectrum identified, assigned or licensed for terrestrial IMT services, such use should occur only with the consent of the relevant spectrum holder and appropriate regulatory approval.

Subject to these principles, Paradise believes the Commission’s proposed framework provides a strong foundation for satellite regulation in Anguilla.

Question 2: “Should the Commission prioritise particular satellite use cases? If so, please rank them and provide reasons.”

Paradise Mobile Response: Paradise believes the Commission should prioritize satellite use cases according to the practical benefit they can provide to Anguilla, while avoiding unnecessary restrictions on other legitimate applications.

Our suggested order of priority is:

1. **Emergency communications and network resilience.** Satellite technology is uniquely valuable when terrestrial networks, submarine cables or supporting infrastructure are damaged or unavailable. Anguilla’s exposure to hurricanes makes this, in our view, the highest-value use case.
2. **Direct-to-device supplementary mobile coverage.** D2D can extend the reach of existing mobile networks into areas where terrestrial coverage is difficult or uneconomic and can provide an important fallback during outages.
3. **Satellite backhaul for terrestrial telecommunications networks.** Satellite backhaul can provide redundancy for mobile sites and other critical infrastructure and can materially improve the resilience of the overall telecommunications ecosystem. The Commission itself recognises satellite backhaul as supporting resilience, disaster recovery and hybrid terrestrial-satellite networks.

4. **NGSO broadband for underserved, remote and temporary locations.** Satellite broadband can provide high-quality connectivity where the economics or geography of terrestrial infrastructure are challenging.
5. **Maritime connectivity and public-service applications.** These services are particularly relevant to Anguilla given its geography, tourism sector and surrounding territorial waters.
6. **IoT, M2M and experimental high-capacity satellite applications.** These are valuable emerging use cases and should be permitted, but we believe they are presently of lower immediate national importance than resilience, broadband and supplementary mobile coverage.

This ranking should not operate as a restriction on other satellite services. Rather, Paradise believes it should guide the Commission when allocating regulatory attention and facilitating services that provide the greatest immediate public benefit to Anguilla.

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?”

Paradise Mobile Response: Paradise believes coexistence between satellite and terrestrial services is achievable, but interference risk cannot be assessed purely from international case studies. Every market has a unique mix of spectrum, network topology, equipment and propagation conditions. Practical considerations can include PIM, constructive and destructive interference, adjacent-channel effects and the cumulative interaction of multiple systems.

This is particularly relevant to Paradise because our requested and planned terrestrial microwave spectrum includes frequencies overlapping several of the Commission’s proposed satellite bands, including approximately 10.715–10.955 GHz, 11.205–11.445 GHz, 14.750–14.800 GHz, 71–73 GHz and 81–83 GHz. The Commission itself notes terrestrial microwave use in the 10 and 11 GHz ranges.

From a practical engineering perspective, point-to-point microwave systems are generally highly directional. Their Fresnel zones are tightly constrained and, depending on the antenna and frequency, beamwidths can be extremely narrow, in some cases around 0.5 degrees. In theory, this should materially reduce the likelihood of harmful interaction with satellite systems outside the direct path.

However, there are relatively few practical regional examples of dense satellite and terrestrial microwave coexistence from which definitive conclusions can be drawn. The reality is that none of us can know with certainty how every interaction will behave until these systems are deployed in Anguilla.

Paradise therefore believes the most important safeguard is vigilant monitoring, coupled with an obligation on all parties to cooperate quickly where interference is identified. For overlapping or adjacent spectrum, Paradise supports Anguilla-specific interference assessments and practical mitigation measures such as coordination, power limitations, frequency avoidance, geofencing and the ability to promptly modify or cease transmissions where harmful interference occurs.



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The objective should be to enable satellite deployment while retaining sufficient flexibility to respond quickly to real-world interference conditions as they emerge.

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

Paradise Mobile Response: Paradise broadly agrees with the Commission’s proposed use of Ku and Ka bands for satellite broadband. These bands are already well established internationally for NGSO broadband, and the Commission’s proposal appropriately contemplates shared use subject to the ITU Radio Regulations, coordination requirements, power limits and minimum elevation angles.

Our principal qualification concerns coexistence with terrestrial microwave. Paradise’s requested and planned point-to-point spectrum includes portions of the 10.7 GHz, 11 GHz and 14.7 GHz ranges that overlap the proposed Ku-band authorizations.

We therefore support the proposed allocations provided that they do not displace or prejudice existing or reasonably foreseeable terrestrial fixed-service use. Where frequencies overlap, the Commission should require practical coordination between affected operators and retain the ability to impose appropriate technical conditions if real-world interference is observed.

Subject to those protections, Paradise supports the Commission’s Ku- and Ka-band proposals.

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 justifications for your answers.”

Paradise Mobile Response: Paradise broadly supports making V, E and W bands available for satellite services, but believes terrestrial microwave use must remain fully protected where there is existing or reasonably foreseeable demand.

This is particularly important in E-band. Paradise has requested and planned terrestrial point-to-point use of **71–73 GHz and 81–83 GHz**, which sits directly within the Commission’s proposed satellite E-band ranges. The Commission itself recognizes that E-band may also be valuable for terrestrial microwave and that coexistence requires further consideration.

Paradise therefore recommends that E-band satellite gateways be authorized on a **site-specific and coordinated basis**, rather than through blanket nationwide access. Where satellite and terrestrial assignments overlap, practical measures such as path coordination, frequency avoidance, exclusion zones and non-interference conditions should be used to preserve terrestrial high-capacity links.

For V and W bands, Paradise has no objection in principle to the Commission’s proposed approach, particularly where use remains conditional and subject to non-interference obligations. The objective should be to enable both satellite and terrestrial innovation without prematurely foreclosing spectrum that may become important for either use.



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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.”

Paradise Mobile Response: Yes. Paradise has requested and planned terrestrial spectrum that overlaps directly with portions of the Commission’s proposed satellite bands.

Of particular relevance are point-to-point microwave frequencies in approximately **10.715–10.955 GHz, 11.205–11.445 GHz, 14.700–14.800 GHz, 71–73 GHz and 81–83 GHz**. These are intended for highly directional terrestrial backhaul links using narrow-beam antennas and tightly constrained Fresnel zones.

The principal interference concern is therefore not broad-area congestion, but the possibility of co-channel or adjacent-channel energy entering sensitive terrestrial receivers, particularly where satellite geometry, gateway siting or aggregate constellation activity aligns unfavourably with a terrestrial path.

At this stage, Paradise does not believe it would be appropriate to assume that harmful interference will necessarily occur. Conversely, we do not believe it should be assumed that coexistence will always be benign. The correct approach is to assess actual deployments on a site- and path-specific basis and to monitor performance once systems become operational.

Paradise would be pleased to provide more detailed path, antenna and site information to the Commission on a confidential basis where required for coordination.

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

Paradise Mobile Response: Yes. Paradise believes an Anguilla-specific interference assessment should be required where a proposed satellite deployment overlaps or is immediately adjacent to terrestrial spectrum use, particularly for gateway stations, high-power earth stations and other deployments presenting a meaningful interference risk.

International studies provide useful guidance, but they cannot fully account for Anguilla’s particular combination of spectrum assignments, microwave paths, antenna characteristics, terrain and network deployments.

The assessment should consider existing and reasonably foreseeable terrestrial spectrum use; fixed-link locations and paths; antenna azimuth, gain, beamwidth and polarization; satellite and earth-station power levels; PFD and out-of-band emissions; aggregate constellation effects; elevation angles; and the ability to mitigate interference through power reduction, frequency avoidance, geofencing or cessation of transmission. The Commission already proposes collecting many of these technical parameters for large and high-power earth stations.

Paradise would, however, encourage a proportionate approach. A detailed site-specific assessment should not be required for every ordinary consumer terminal operating within an approved blanket authorization. The regulatory burden should correspond to the actual interference risk presented by the deployment.

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 neighbour-jurisdiction coordination before deployment?”

Paradise Mobile Response: Yes. Paradise believes gateway earth stations should generally be subject to site-specific review and coordination because their power levels, antenna characteristics and concentrated use of spectrum create a materially different risk profile from ordinary consumer terminals.

The Commission should require registration of gateway locations and technical parameters, together with coordination with affected terrestrial spectrum users and neighboring jurisdictions where relevant. Coordination or exclusion zones should be applied where engineering analysis demonstrates that they are necessary to protect existing or planned services.

Paradise would not support rigid exclusion zones applied universally without regard to actual interference risk. These should be determined on a case-by-case basis using the characteristics of the proposed gateway, surrounding spectrum use and the relevant terrestrial paths.

Public notice may also be appropriate for major gateway installations, particularly where they could affect other licensed spectrum users, provided the process is proportionate and does not unnecessarily delay deployment.

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

Paradise Mobile Response: Paradise generally agrees with the Commission’s proposed modular licensing framework. The approach is flexible and allows different satellite services to be regulated according to their actual technical and commercial characteristics rather than forcing every operator into the same licensing structure.

Paradise particularly supports the ability to combine multiple licensing modules into a single regulatory instrument. The Commission itself notes that, in practice, the relevant modules could be incorporated into one license document.

We would encourage the Commission to preserve that simplicity in implementation. A modular framework should not result in multiple duplicative applications, annual fees, reporting requirements or renewal processes for a single operator where those obligations can reasonably be consolidated.

Paradise also supports maintaining a clear distinction between satellite services using shared satellite spectrum and satellite services using IMT spectrum already assigned to terrestrial mobile operators. In the latter case, the framework should continue to require the consent of the relevant spectrum holder and should not confer independent spectrum rights on the satellite operator.

Subject to these points, Paradise supports the proposed licensing framework.



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

Paradise Mobile Response: Yes. Paradise generally agrees with the Commission’s proposed information requirements for large and high-power earth stations.

Given the higher power levels, larger antennas and greater potential for interference associated with gateways, teleports, feeder links and TT&C facilities, it is reasonable for the Commission to require detailed technical and site information before granting authorization. The proposed requirements include coordinates, frequencies, bandwidths, EIRP, antenna characteristics, elevation angles, ITU filing and coordination status, emission characteristics, and interference mitigation capabilities.

Paradise would recommend that these requirements remain proportionate and focused on information that is materially relevant to interference management and regulatory compliance. Applicants should not be required to repeatedly provide substantially identical information where it has already been supplied through another license or authorization process.

Where proposed operations overlap with terrestrial fixed or mobile spectrum, the Commission should also require sufficient information to enable meaningful coordination with affected spectrum users before deployment.

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.”

Paradise Mobile Response: Yes. Paradise strongly agrees that MNOs should be permitted to use spectrum already assigned to them for satellite-based supplementary coverage, including D2D, D2C, IoT and M2M services.

Paradise believes the underlying principle should be simple: the terrestrial spectrum holder should retain control over how its assigned spectrum is used, provided that all applicable technical and interference requirements are met. A satellite operator should therefore be permitted to use an MNO’s spectrum only with the explicit consent of that MNO and appropriate regulatory approval.

Paradise supports the Commission’s proposed approach that satellite use remain secondary to the MNO’s terrestrial use and that no independent spectrum rights be conferred on the satellite operator. We would, however, suggest using terminology such as “**make spectrum available pursuant to a commercial agreement**” rather than necessarily characterizing every arrangement as a spectrum lease. In some cases, the MNO may simply be purchasing supplemental coverage from a satellite provider while retaining full control of its spectrum authorization.

The framework should also remain technology-neutral and forward-looking. Any IMT spectrum assigned to an MNO should remain potentially eligible for supplemental satellite use where technically feasible, rather than limiting future services only to bands supported by satellite systems today.

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.”

Paradise Mobile Response: Paradise generally supports the Commission’s proposed power limits as an initial baseline for D2D services using terrestrial mobile spectrum.

The Commission proposes adopting the same unwanted-emission limits used by Ofcom for D2D operation in mobile bands. Paradise believes this is a reasonable starting point because it is based on recent coexistence work and provides a defined technical framework for protecting terrestrial mobile networks.

Paradise does not believe these limits should be treated as immutable as every terrestrial network has different site geometries, antenna configurations, spectrum assignments and interference environments. The Commission should therefore retain the ability to impose tighter limits where actual interference is demonstrated, while also allowing alternative limits where an MNO and its satellite partner can demonstrate through engineering analysis that equivalent or better protection will be achieved.

Most importantly, any relaxation of interference protections affecting spectrum already assigned to an MNO should occur only after consultation with the affected spectrum holder. The objective should be to protect terrestrial service quality while allowing satellite systems sufficient flexibility to operate effectively.

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.”

Paradise Mobile Response: Paradise generally agrees that a 10° minimum elevation angle is a reasonable initial baseline for D2D services using terrestrial mobile spectrum.

The Commission’s proposal follows Ofcom’s analysis, which concluded that a 10° minimum elevation angle provides a practical balance between protecting terrestrial mobile base stations from harmful interference and preserving sufficient satellite coverage.

Paradise does not believe, however, that the 10° figure should be treated as an absolute rule in all circumstances. The appropriate elevation constraint may vary depending on the spectrum band, terrestrial network configuration, satellite power levels, antenna characteristics and actual interference environment.

We therefore support 10° as the default minimum, while allowing the Commission to require a higher angle where justified by demonstrated interference risk, or to approve an alternative arrangement where the affected MNO and satellite provider can demonstrate through engineering analysis that equivalent protection will be achieved.

As with power limits, any change that materially reduces protection for an MNO’s assigned spectrum should involve consultation with the affected spectrum holder.



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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 change/removed/modified?”

Paradise Mobile Response: Paradise does not believe that every D2D service operating in shared 3GPP NTN spectrum should automatically be subject to the complete regulatory framework applicable to terrestrial mobile networks.

The appropriate obligations should depend on the actual service being provided. A satellite service offering full voice, messaging, broadband and general-purpose consumer connectivity should reasonably be expected to meet many of the same consumer protection, emergency service, interconnection and quality-of-service obligations as a terrestrial mobile provider.

Conversely, applying the same requirements to a limited-capability service providing only emergency messaging, low-rate data, asset tracking or IoT connectivity would be disproportionate and could unnecessarily discourage deployment.

Paradise therefore recommends a **service- and capability-based approach**. Obligations such as interconnection, emergency calling, numbering, quality of service and consumer protection should apply where they are technically and commercially relevant to the service being offered, rather than simply because the underlying technology is classified as D2D or NTN.

This approach is also consistent with the Commission’s stated objective of maintaining a proportionate and technology-neutral regulatory framework.

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

Paradise Mobile Response: Paradise believes emergency calling obligations should be based on the actual capabilities of the D2D service being offered.

Where a D2D service supports conventional voice calling and presents itself as an extension or supplement to terrestrial mobile service, it should be expected to support emergency calling, appropriate routing to the relevant emergency authority, and the transmission of location and callback information where technically available.

The Commission notes that the FCC requires terrestrial providers using supplemental coverage from space to route emergency voice calls and texts to a Public Safety Answering Point or emergency call center, together with available location and subscriber information. Paradise considers this a useful reference point.

However, a messaging-only, SOS-only, or low-rate data service should not be required to provide functionality that the underlying technology cannot technically support. In those cases, the provider should instead clearly disclose the limitations of the service and ensure that any emergency functionality it does offer is routed appropriately.

Paradise therefore recommends a capability-based approach that preserves meaningful emergency access without imposing technically impossible obligations on limited-function satellite services.



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

Paradise Mobile Response: Paradise supports the Commission’s E-band proposal only on a conditional basis.

E-band is already an important terrestrial backhaul resource for Paradise. Our requested and planned point-to-point spectrum includes **71–73 GHz and 81–83 GHz**, which sits directly within the Commission’s proposed satellite E-band ranges of 71–76 GHz and 81–86 GHz. The Commission also recognizes that E-band may have competing terrestrial microwave uses.

Paradise therefore recommends that satellite use of E-band be authorized on a **site-specific and coordinated basis**, particularly for gateway earth stations. Existing and reasonably foreseeable terrestrial fixed links should be taken into account before authorization, with practical mitigation measures such as path coordination, frequency avoidance, power restrictions or exclusion zones applied where necessary.

We do not believe E-band should be reserved exclusively for terrestrial use, nor do we oppose satellite use in principle. However, satellite authorization should not sterilize spectrum that is already valuable for high-capacity terrestrial microwave.

Paradise also supports the Commission’s proposal to treat E-band authorization as temporary through December 2028 pending the outcome of WRC-27.

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

Paradise Mobile Response: Paradise generally agrees with the Commission’s proposed approach to W-band.

W-band remains an emerging area for satellite communications, and the Commission proposes making it available for gateway feeder links on a non-interference and non-protection basis, with transmission required to cease if harmful interference is caused to services operating in accordance with the Radio Regulations.

Paradise believes this is a sensible approach given the relative immaturity of the ecosystem and the limited practical deployment experience currently available. The framework should remain flexible enough to accommodate future terrestrial or satellite uses as technology develops and as the international regulatory position becomes clearer.

We therefore support temporary W-band authorization through December 2028 pending the outcome of WRC-27, provided that existing and future authorized terrestrial services remain protected and that the Commission retains the ability to modify or terminate operations where harmful interference is demonstrated.



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We therefore support temporary W-band authorization through December 2028 pending the outcome of WRC-27, provided that existing and future authorized terrestrial services remain protected and that the Commission retains the ability to modify or terminate operations where harmful interference is demonstrated.

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

Paradise Mobile Response: Paradise generally agrees with the Commission’s proposed telecommunications licensing fee approach.

We believe it is reasonable for satellite providers offering telecommunications services directly to customers in Anguilla to contribute toward the cost of regulation on a comparable basis to terrestrial providers. The proposed revenue-based levy, including a minimum contribution for smaller operators, provides a relatively straightforward mechanism for doing so.

Paradise would, however, encourage the Commission to ensure that the framework remains proportionate and avoids duplicative charges. Where a satellite service is being provided through an existing licensed MNO under that MNO’s existing authorization, additional licensing fees should reflect genuine incremental regulatory costs rather than effectively charging twice for the same underlying service or authorization.

Subject to that principle, Paradise supports the Commission’s proposed approach.



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

Paradise Mobile Response: Paradise generally agrees with the Commission’s proposed approach to spectrum fees for shared satellite bands, including the use of a flat annual fee rather than a bandwidth-based charge. The Commission proposes an annual fee of EC\$10,000 per shared satellite band, including Ku, Ka, V, E, W and applicable non-IMT 3GPP NTN bands.

Our principal concern is avoiding duplicate spectrum charges where satellite services use spectrum already assigned to and paid for by an existing MNO. In those circumstances, Paradise does not believe the same spectrum should attract a second spectrum usage fee merely because part of the coverage is being delivered from space.

Where additional regulatory work is genuinely required, such as interference investigation or additional coordination, Paradise would support reasonable cost recovery tied to the actual incremental regulatory burden.

Accordingly, Paradise supports the proposed fee structure for shared satellite spectrum, provided that IMT spectrum used under an existing MNO authorization is not subject to duplicative spectrum fees.

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

Paradise Mobile Response: Paradise believes the consultation is thoughtful, forward-looking and generally strikes the right balance between enabling satellite innovation and protecting existing terrestrial services. We are strongly supportive of satellite connectivity and believe that NGSO broadband, D2D and satellite backhaul will become increasingly important components of modern telecommunications networks.

Paradise would emphasize several principles as the framework is finalized. First, spectrum assigned to an MNO should remain under the control of that MNO. Where satellite operators use IMT spectrum, they should do so only pursuant to the consent of the relevant spectrum holder and should receive no independent rights to that spectrum. Paradise strongly supports the Commission’s proposed language establishing this principle.

Second, responsibility for D2D operations should reflect actual operational control. The proposed MNO amendment currently provides that the MNO remains primarily responsible and liable for all spectrum use by the satellite operator. Paradise believes the MNO should remain responsible for compliance with its spectrum authorization and for maintaining appropriate contractual controls, but the satellite operator should also remain directly accountable for aspects of network operation within its control. Similarly, requirements for immediate shutdown should recognize that an MNO may rely on enforceable technical or contractual mechanisms rather than directly controlling the satellite constellation itself.

Third, regulatory reporting and disclosure should remain proportionate. Paradise supports appropriate reporting, interference monitoring and Commission oversight, but commercially sensitive satellite agreements should remain confidential and reporting requirements should be reduced once a service has demonstrated stable operation. The proposed requirement for quarterly reporting and Commission audit access should therefore be implemented proportionately.



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Finally, the framework should preserve flexibility. Satellite and terrestrial technologies are developing rapidly, and practical coexistence experience in the Caribbean remains limited. Regulations should establish sensible initial technical protections while allowing those requirements to evolve based on actual operational experience. Where harmful interference occurs, operators and the Commission should be able to respond quickly. Conversely, where experience demonstrates that coexistence can safely occur under less restrictive conditions, the framework should allow those conditions to evolve as well.

Overall, Paradise strongly supports the Commission's effort to establish a satellite framework and believes that, with these refinements, Anguilla can create a regulatory environment that encourages satellite innovation while protecting investment, competition and the integrity of existing telecommunications networks.