
Rivada Space Networks:

Comments on the Public Notice 2026-2 –
Consultation on Spectrum and Licensing
Framework, Including NGSO Broadband,
Direct-to-Device Services and Satellite Earth
Stations issued by the Public Utilities
Commission of Anguilla

1. Introduction

Rivada Space Networks (Rivada) is a global leader in satellite communications, pioneering innovative solutions through its state-of-the-art Non-Geostationary Satellite Orbit (NGSO) constellation. Designed to deliver secure, high-speed, and low-latency data services, Rivada's network focuses on business-to-business and government applications. Unlike traditional satellite operators, Rivada employs an advanced optical inter-satellite link architecture, forming a fully meshed optical network in space known as the Rivada Outernet. This groundbreaking design results in a gateway-less network eliminating the reliance on gateways and terrestrial infrastructure, significantly reducing latency and enhancing data transmission speeds, ideal for mission-critical applications.

Using Ka-band spectrum for its service links, Rivada's system offers high-capacity data transmission tailored to meet the demands of enterprise customers, government agencies, and other sectors requiring secure and reliable connectivity. The Ka-band's substantial bandwidth enables next-generation satellite services with high data rates, ensuring seamless communication across even the most remote and underserved areas.

As a strong advocate for open and competitive markets, Rivada supports regulatory frameworks that foster innovation, promote efficient spectrum use, and reduce barriers to entry for NGSO satellite operators. The company believes regulatory policies should facilitate investment and fair competition, ensuring that consumers benefit from high-quality, affordable satellite services. Rivada is dedicated to collaborating with regulators, governments, and industry stakeholders to create an environment that drives innovation and advances the global satellite communications landscape.

By leveraging cutting-edge technology and advocating for progressive policies, Rivada will transform satellite communications, delivering solutions that connect people, businesses, and governments worldwide.

2. Rivada's Comments

We appreciate the opportunity offered by the Public Utilities Commission (Commission) for the public to participate in the regulatory framework proposed. It is our intention to contribute in order to make rules and recommendations favor a more open market, enhancing competition and benefiting consumers from innovative services that are reliable, resilient and fit for purpose. This requires careful consideration of the proposed regulations to make sure it is translated to actual positive results. From Rivada we believe that this is possible by maintaining a flexible approach to allow coexistence amongst technologies and operators, as well as good use of spectrum resources.

As a general remark, Rivada considers that interference avoidance between GSO and NGSO systems is not a one-way mechanism. While in some frequency ranges, GSO satellite networks are protected by EPFD limits, GSO satellite networks have the obligation to protect prior NGSO satellite systems in other frequency ranges (e.g. 18.8-19.7 GHz and 28.6-29.5 GHz). Coordination is required for GSO satellite networks with respect to NGSO satellite systems

under RR Article No.9.13. Earth stations operating in GSO satellite networks must have better antenna patterns to avoid unnecessary transmissions towards the directions not targeting GSO arc. Allowing unbounded operations to GSO satellite networks will cause significant interference to small and mid-size NGSO satellite systems. Some NGSO satellite systems may not have the capability to avoid interference from GSO earth stations.

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

Rivada commends the Commission on its efforts to review the authorisation framework, including spectrum allocation, interference, and fee requirements, for the provision of broadband satellite services in the country. The initiative to improve the regulatory framework for satellite services is a pivotal step in promoting the adoption of innovative technologies which will incentivize investment in the sector and will expand consumer choices. Aligning its policies with internationally recognized best practices will position Anguilla as one of the world’s most modern and technology-friendly jurisdictions.

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?

Rivada believes that Radio Regulations sufficiently describe the necessary steps (e.g. coordination or hard limits) to avoid harmful interference. It is a proven mechanism that has worked internationally and that operators are confident gives them enough protection and flexibility.

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

Rivada appreciates the Commission’s initiative to align the Ku and Ka-band frequency allocations with the ITU Radio Regulations. However, after reviewing the “**Ku and Ka-Band Proposals**” Section of the consultation, it appears that the downlink portion of the Ka-band - **17.3 – 20.2 GHz – space-to-Earth** - is missing from Table 6.

Indeed, the allocation of the spectrum in the 17.3-20.2 GHz to Fixed Satellite Service (FSS) (space-to-Earth) is in line with Article 5 of the ITU Radio Regulations, Region 2 Table of Frequency Allocations¹.

Concerning the 17.3-17.7 GHz portion of the band, in 2024, the Federal Communications Commission (FCC) released a Report and Order permitting its use by non-geostationary satellite orbit (NGSO) systems, resulting in an allocation of a contiguous 1,300 MHz of

¹ See International Telecommunications Union WRC-23 Final Acts, Article 5, (Aug. 19, 2024), https://www.itu.int/dms_pub/itu-r/opb/act/R-ACT-WRC.16-2024-PDF-E.pdf.

spectrum for NGSO downlink operations.² Similarly, the Inter-American Telecommunication Commission (CITEL) published a Recommendation urging member states to adopt the use of the 17.3-17.7 GHz frequency band for space-to-Earth operations of GSO and NGSO systems.³

As a result, allocation of the spectrum in the 17.3-17.7 GHz band to FSS (space-to-Earth) would be further aligned with emerging regional best practices. We therefore recommend that it is also adopted by the Commission.

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

Rivada considers adding this requirement an artificial barrier to enter the market that harms competition more than the potential benefit from avoiding interference. A general and proper assessment requires accurate and complete information shared between the parties in advance. Rivada believes that submitting a comprehensive interference assessment is never possible due to the sensitivity of the information shared between the operators during coordination. Rivada proposes to the Commission to incorporate bench marked mechanisms in interference management that have been used internationally, where there is collaboration between operators when a potential risk of interference is identified and should be addressed individually.

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 neighbor-jurisdiction coordination before deployment?

Rivada believes that gateway earth stations should be limited to specific zones while also allowing the operation of user terminals in the area.

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

Rivada appreciates the Commission's willingness to review its multi-service licensing framework by introducing a modular system while maintaining a technology-free approach and recognizing the various levels of providers within the satellite ecosystem.

Rivada, as a wholesale capacity provider, advocates for an “**open skies**” framework, which avoids the imposition of additional licensing layers on satellite operators and the corresponding administrative burdens on both industry and the regulator. Indeed, the term “landing rights” is highly misleading as not every technology requires the use of terrestrial gateways and not all systems with such gateways will have one in-country. In Rivada's case, for example, its network architecture does not rely on terrestrial gateways, as traffic is routed

² See Amendment of Parts 2 and 25 of the Commission's Rules to Enable NGSO Fixed-Satellite Service (Space-to-Earth) Operations in the 17.3-17.8 GHz Band, Report and Order, IB Docket No. 22-273, FCC 24-97 (Rel. Sept. 27, 2024), <https://docs.fcc.gov/public/attachments/FCC-24-97A1.pdf>

³ Use of the Band 17.3-17.7 GHz (s-E) For Fixed-Satellite Service in Region 2, PCC.II/Rec. 69 (XLIII-24), Organization for American States, Inter-American Telecommunication Commission (2024), <https://www.oas.org/citevents/en/Documents/ByDocumentType/4>.

entirely in space. This ground-breaking technology eliminates the need for reliance on terrestrial ground infrastructure.

An open skies policy directly benefits end users by facilitating the timely deployment of innovative satellite services at competitive and affordable prices, while preserving service providers' ability to select among multiple capacity suppliers. In addition, an open skies policy is in full alignment with international best practices, including the recently published **Satellite Licensing Best Practices**⁴ by the Global Satellite Operators Association (GSOA).

A less favorable alternative to a full open-skies policy is a simplified—or “light-touch”—landing-rights regime. Under this model, foreign satellite operators are generally required only to register basic technical and ITU coordination information, and are exempt from burdensome authorization procedures or obligations such as establishing a local legal entity.

Canada, for example, has adopted this type of light licensing framework, requiring foreign satellite operators to submit only minimal data to be listed among the satellites authorized to operate within Canadian territory. Other examples are Argentina, Dominican Republic, Paraguay, Peru, to name a few.

By contrast, more restrictive landing-rights regimes can limit competition and stifle innovation, resulting in fewer service options, constrained satellite capacity, and higher prices for end-users.

Concerning the authorizations for user terminals and earth stations in motion (ESIMs), Rivada strongly supports the Commission's introduction of **blanket authorizations**, in line with international best practices.

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

Rivada believes that coordinates, EIRP mask, transmit and receive gain masks, carrier bandwidth, minimum elevation angle are sufficient for any interference assessment, as it has been recognized internationally. ITU filings have to comply with Articles 21 and 22 which allow for the operation of the terminals in shared spectrum in an interference free environment. All operators with notified filings in the ITU must be compliant with these limits. Rivada believes that submission of this information may result redundant given all information exists in the ITU filings and is available for the Commission to resort to.

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.

Rivada believes that minimum elevation angle shall be evaluated on a case-by-case basis and a single value should not be enforced. This is particularly important because not all

⁴ [Satellite Licensing Best Practices – GSOA | Connecting Everyone, Together](#)

constellations are created equally; they behave in different patterns and most importantly, serve different purposes with different terminals.

Question 18. Do you agree with this telecommunications licensing fee approach? If not, what are the alternatives given the existing legislative requirements? (page 53)

Application Fee: Rivada respectfully disagrees with the proposed application fee of \$1,250. As discussed in response to Question 9 above, Rivada encourages the Commission to adopt an Open Skies policy for satellite operators. In Rivada's view, a local licensing requirement is more appropriately directed toward local service providers that establish a commercial presence in Anguilla and provide telecommunications services directly to end users, rather than satellite operators whose space assets and spectrum rights are already subject to international coordination and regulatory oversight through the ITU and their respective filing administrations.

Requiring satellite operators to obtain an additional local license and pay an application fee risks creating duplicative and unnecessary regulatory requirements, without providing a corresponding regulatory benefit. It could also introduce an unnecessary barrier to market entry and potentially discourage satellite operators from making their capacity available in Anguilla.

Rivada, therefore, recommends that the Commission waive the application fee for satellite operators that qualify under an Open Skies framework and limit local licensing requirements, as appropriate, to entities providing services directly within Anguilla. Alternatively, if the Commission considers some form of authorization necessary for satellite operators, Rivada recommends a simple, streamlined registration subject only to a nominal, cost-based administrative fee.

Annual Payments: Subject to the comments under 'Application Fee' above, Rivada agrees, in principle, with the cost recovery proposal. Indeed, regulatory fees should be limited to recovering the reasonable administrative costs of processing and managing authorizations, while fee structures should reflect the unique characteristics of satellite networks.

Licensing fees, spectrum charges, and other taxes imposed on satellite communication systems play a significant role in the affordability and adoption of satellite services. To encourage investment, innovation, and expanded connectivity, these costs should be transparent, predictable, proportionate, and should not create unnecessary barriers to market entry.

Unlike terrestrial mobile networks, the satellite industry operates under a fundamentally different economic model. Satellite systems provide coverage across multiple countries but often serve relatively small numbers of users, delivering specialized services such as connectivity for maritime and aviation platforms, disaster response, government communications, and remote or underserved communities beyond the reach of terrestrial

infrastructure. Regulatory and fee frameworks should recognize these differences to avoid imposing disproportionate financial burdens that could hinder the deployment and expansion of satellite services.

In this sense, Rivada advocates for a flat fee structure that accounts for reasonable administrative costs strictly necessary for the management of satellite authorizations. This approach is in line with industry best practices.

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

Rivada appreciates the Commission's proposal to apply an annual fee of EC\$10,000 in relation to shared spectrum, as opposed to a price-per-band approach.

A reasonable, flat licensing fee that reflects the unique characteristics and economic realities of satellite networks promotes investment, encourages market entry, and supports the sustainable expansion of satellite services. By providing regulatory certainty and avoiding disproportionate costs, such a fee structure fosters competition, stimulates innovation, and enables operators to extend connectivity to underserved and remote communities.

Rivada also applauds the Commission's proposal to not impose fees on user terminals or other devices and equipment communicating with satellites including smartphones, provided that they meet the requirements of the Radio Regulations.

Exempting end-user equipment from licensing or regulatory fees reduces unnecessary administrative burdens for both regulators and operators, lowers the cost of adoption for consumers and businesses, and facilitates the rapid deployment of satellite-enabled services. This approach also aligns with international best practices by promoting seamless access to satellite services, encouraging innovation, and ensuring that regulatory frameworks remain technology-neutral while supporting broader digital inclusion and resilient communications infrastructure.

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

Section 24. Local Legal Presence

The proposed requirement for satellite operators to establish a legal presence in Anguilla through local incorporation is unnecessary and may create an undue barrier to market entry without providing corresponding regulatory benefits. Satellite operators typically provide services on a cross-border basis through global or regional networks and, unlike terrestrial operators, do not deploy or maintain extensive physical infrastructure within each jurisdiction where they are authorized to operate. Requiring local incorporation would impose additional administrative, legal, and financial burdens that are disproportionate to the nature of satellite operations and could discourage investment and delay the introduction of innovative satellite services.

In line with international best practices, Rivada encourages the Commission to abandon such a requirement from space capacity operators focusing instead on service providers who bear a higher regulatory burden than the provision of space segment capacity.

In addition, regulators can retain full authority to enforce licensing conditions, collect applicable fees, and ensure compliance with national laws by requiring operators to designate a point of contact or authorized representative for regulatory communications, notices, and service of process, where necessary. This approach achieves the Commission's regulatory objectives while avoiding unnecessary barriers to entry.

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