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By Email – consultations@puc.ai

Mr. Damien Harrigan
Executive Director
Anguilla Public Utilities Commission
Hansa Building II – Unit 1
Cosley Drive
The Valley, Anguilla

**Re: Public Notice 2026-2
Comments of Space Exploration Technologies Corp.**

Dear Mr. Harrigan:

Space Exploration Technologies Corp. ("SpaceX") is pleased to provide the Anguilla Public Utilities Commission ("Commission") with comments in response to the Commission's consultation in the above-referenced public notice.

Background on SpaceX

SpaceX operates Starlink, a non-geostationary orbit ("NGSO") satellite constellation that delivers high-speed, low-latency broadband and direct-to-device ("D2D") connectivity. SpaceX respectfully urges the Commission to adopt a modern, technology-neutral satellite framework that (i) enables rapid market access ; (ii) modernizes outdated Article 22 equivalent power flux-density ("EPFD") constraints under Radio Regulations No. 22.5CA; (iii) opens highly shareable high-frequency gateway bands; and (iv) prices shared satellite spectrum on a cost-recovery, non-discriminatory basis.

Responses to Consultation Questions

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

Response: Yes.

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

Response: The Commission should prioritize all current NGSO use cases, which include broadband internet access, backhaul, D2D, earth stations in motion (“ESIMs”) and point-to-point connectivity.

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?

Response: No. The values contained in the Commission’s public notice are conservative, and ongoing work at the ITU continues to refine and update the technical assumptions underlying those criteria.

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

Response: SpaceX largely agrees with the Commission’s Ku- and Ka-band proposals for high-speed NGSO broadband, subject to the following refinements:

1. The Commission should expressly include space-to-Earth Ku-band frequencies in the 12.2–12.7 GHz range within the authorized set for NGSO user downlinks. That segment is a core part of modern NGSO broadband deployments and is already addressed in leading frameworks including the United States’ Federal Communications Commission and the United Kingdom’s Office of Communications. Omitting 12.2–12.7 GHz would unnecessarily constrain capacity available to Anguillan users.
2. Anguilla should embrace a performance-based approach rather than constraining any system based on ITU radio regulations. So long as a system is able to operate without causing interference into others, factors like antenna size and power limits should be irrelevant.

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.

Response: SpaceX strongly supports making the V, E, and W bands available for satellite services, particularly for high-capacity gateway earth stations serving NGSO broadband, and we oppose any decision that would reserve these bands exclusively for terrestrial microwave to the exclusion of satellite use.

Starlink commends Anguilla’s forward-looking approach but believes that Anguilla should not freeze authorizations on 31 December 2028 if operators can demonstrate ongoing non-interference. Frequency authorizations in rapidly evolving mmWave bands should be updated on a rolling, evidence-based basis rather than waiting solely for infrequent WRC milestones. Leading administrations, including the United States, the United Kingdom, Australia, have already enabled E- and W-band gateway use to support commercial NGSO investment.

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.

Response: SpaceX is not aware of any existing services in Anguilla that may be affected by the use of the proposed satellite bands.

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

Response: No. Such a requirement is not typical in the international community and will dissuade operators from investing in the telecommunications infrastructure of Anguilla. Where a gateway is proposed in Anguilla, registration and ordinary site data like site coordinates, frequencies used, and antenna characteristics are appropriate to share for coordination to occur at the operator level.

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?

Response: No. SpaceX suggests the adoption of more flexible spectrum-assignment mechanisms, such as light licensing, simplified requirements, and local or regional authorizations to enable innovative business models and vertical use cases. These measures would help reduce entry barriers, promote more efficient use of available spectrum, and encourage experimentation across diverse geographic and operational contexts.

To this end, Anguilla should consider streamlining access to millimeter wave bands through a unified light-licensing framework that accommodates both satellite and terrestrial deployments, supported by a shared third-party database for coordination purposes. Such an approach would significantly simplify regulatory requirements for operators and avoid unnecessary complexity, paperwork, and delays.

Under a unified light-licensing model, operators could swiftly obtain a nationwide, non-exclusive authorization and subsequently register individual sites in a third-party database on a first-in-time basis. The database administrator would apply standardized technical criteria, such as a common interference-to-noise ratio threshold (e.g., -6 dB I/N), to conduct automated interference analyses between new and existing registrations. Where potential interference risks are identified, operators could mitigate them through technical adjustments (such as modifying site locations, shielding, or operational parameters) or through coordination with affected parties. This system allows access to spectrum in a matter of minutes rather than the weeks, months, or even years often required under traditional licensing regimes, while still providing protection against harmful interference from subsequently registered users.

Importantly, a unified light-licensing framework also discourages spectrum warehousing through transparency and objective, physics-based usage rights, combined with construction and operational requirements, good-faith coordination obligations, and clear dispute-resolution mechanisms. At the

same time, it creates a foundation for future innovation, as the regulator could extend the framework to higher frequency bands as technologies mature, without the need to develop entirely new, bespoke regulatory schemes. The inherent characteristics of high-frequency spectrum, together with the transparency of such a framework, also open the door to more dynamic and intensive spectrum use, including short-term, low-power, indoor, in-motion, or other secondary uses that can coexist without adversely affecting primary users.

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

Response: Yes, provided that the above suggestions are implemented. Starlink additionally commends the proposed user terminal blanket licensing framework

Specifically on the subject of D2D services, Starlink agrees that MSS authorizations should be included in a satellite operator's license. In line with global best practices, Starlink urges that MSS spectrum in Anguilla be assigned by administrative allocation following ITU Radio Regulations and procedures. The Commission should license any operator that applies for access to MSS spectrum, with operations subject to successful coordination with licensees that hold superior ITU rights. By following this simple model, the Commission will come into compliance with ITU rules and harmonize its approach with the rest of the world.

The Commission should also allocate MSS spectrum so that productivity improvements using D2D services can be delivered as quickly as possible. It can accomplish this goal through the imposition of eligibility and deployment conditions to any MSS license. These conditions should include:

- relevant ITU satellite filings to be demonstrated by each licensee, considering the priority attached to that filing;
- use it or lose it conditions – so that the spectrum is not hoarded or under-utilized by speculators who only want to arbitrage the price of spectrum;
- open-access obligations that require the licensee to offer its service to all suitable carriers, so that all MNOs can benefit from an MSS service (subject to the usual criteria such as creditworthiness, service quality, mobile coverage), rather than one MNO using it exclusively; and
- coordination and interference management should be dealt with in accordance with ITU rules.

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

Response: The Commission should implement the modernized EPFD limits of the U.S. Federal Communications Commission ("FCC") instead of the ITU Article 22 limits. The ITU EPFD limits, as described in Article 22, have not received meaningful changes in over twenty years and employ unnecessarily strict power limits, which lead to inefficient use of critical national spectrum in Ku and Ka bands. It is in Anguilla's interest to modernize these limits within its own territory, which is in full compliance with the ITU Radio Regulations, as stipulated in Article 22.5CA. Starlink has proven through its operations in multiple countries, including the United States, that antiquated Article 22 EPFD limits can be safely relaxed while ensuring protection of GSO systems, boosting network capacity and improving service quality for customers at no risk to other operators.

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.

Response: Yes.

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.

Response: Yes.

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.

Response: Yes.

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?

Response: Starlink's D2D agreements with mobile operators should not be classified as interconnection agreements, since Starlink does not terminate calls from the mobile carrier on our network. Moreover, Starlink D2D is a best-effort service designed to extend connectivity to previously unconnected areas and should therefore not be held to the same quality-of-service standards as terrestrial mobile services.

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

Response: D2D services should be able to support emergency calling. Starlink is able to operate emergency text service and voice calling either directly or through partnerships with local mobile operators.

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

Response: Frequency authorizations should be robustly and responsibly updated on a rolling basis. While WRCs provide infrequent yet safe baselines, strict regulatory adherence will result in Anguilla lagging behind international best practice. Anguilla should adopt the E-band model of the FCC, which reflects the status of modern E-band technology while proving safe usage of the band.

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

Response: Yes.

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

Response: SpaceX strongly encourages the use of a simplified and non-formula approach to licensing fees, similar to the approach for spectrum fees. A certain fixed annual payment should be considered if there is a legislative amendment in the future. However, we recognize the current regulatory constraints and requirements; and given this, we do not wholly object to the proposal in the consultation.

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

Response: Yes. SpaceX agrees with the proposed spectrum authorization fee approach of a flat annual fee which is not bandwidth-dependent, together with the explicit confirmation that there will be no per user terminal, device or equipment fees (or any additional fees beyond what is summarized in the consultation). An understanding of a simplified and blanket licensing fee approach is highly commended.

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

Response: As noted in the SpaceX responses to Questions 5, 10, and 16, Anguilla should exercise its national sovereignty to modernize its regulatory framework in areas where international regulations are outdated, such as spectrum allocations and EPFD limitations. While WRCs provide infrequent yet safe baselines, strict regulatory adherence will result in Anguilla lagging behind international best practice. A robust yet responsible regulatory framework that enables the rolling adoption of international best practices will allow Anguilla to promote forward-thinking telecommunications operations.

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Thank you for the opportunity to provide these responses. Should you have any questions, please do not hesitate to contact me.

Sincerely yours,



Ted Price