

28 March 2025

RSPG Secretariat

BY EMAIL: CNECT-RSPG@ec.europa.eu

Subject: Response to Consultation on the Draft RSPG Opinion on the EU-level policy approach to satellite Direct-to-Device connectivity and related Single Market issues

Dear RSPG Secretariat:

Skylo Technologies, Inc. ("Skylo") supports the European Commission's (EC) efforts to foster a clear and consistent regulatory environment for satellite Direct-to-Device (D2D) connectivity across the European Union (EU). Skylo appreciates the opportunity to provide comments to the draft RSPG Opinion, as Skylo believes that a harmonized approach will encourage innovation and competition in this sector, ultimately benefiting European consumers and businesses.

Background on Skylo

Skylo's 'direct-to-device' service is live across five continents, with more than 60 million square kilometers of coverage, which has given Skylo a unique opportunity to assess regulations for D2D services in a wide range of countries. Because Skylo is a D2D Non-Terrestrial Network (NTN) service provider that powers end-to-end satellite service for phones, wearables and Internet of Things (IoT) devices using dedicated, licensed mobile-satellite service (MSS) L- and S-band spectrum and geostationary satellites, Skylo has found that often the same regulatory framework applies for D2D using MSS spectrum as for existing mobile-satellite services. The 'user terminal' is simply a standard smartphone or IoT device allowing existing regulations for mobile-satellite service to perfectly cover the scope of D2D.

One of the most important benefits for people and businesses in Europe is that D2D networks like Skylo's make satellite connectivity affordable, reliable, ubiquitous, and – most importantly – that it works from the same device that consumers have today. Because Skylo uses standardized 3GPP cellular modems to connect to satellites, these services benefit from much greater economies of scale and therefore can be deployed into many more devices because of the lower cost compared to traditional satellite phones that are more limited in scale and therefore more costly. Additionally, by building to 3GPP standards, Skylo is fully interoperable with the terrestrial mobile ecosystem, allowing satellite and terrestrial mobile services to operate no differently than standard roaming today.

D2D services offer a crucial enhancement to connectivity across Europe, especially in areas where terrestrial networks fall short, and in remote geographies and other locations where terrestrial networks are not economically viable. By providing reliable connectivity in vast regions with limited or no coverage, D2D services can significantly improve emergency and disaster response. D2D services also support IoT applications across industries like shipping, mining, energy and environmental monitoring, animal tracking, logistics, agriculture, fishing, healthcare, and enabling data-driven decision-making and operational improvements. These are all critically important sectors of the European economy.

Skylo has seen an exponential increase in the take-up of its service and the interest in deploying Skylo's connectivity has skyrocketed with the recent introduction of Skylo in all Google Pixel 9 smartphones, and partnerships like that with Deutsche Telekom¹. In the United States, where Skylo has been enabling D2D connectivity on Google Pixel 9 phones since August 2024 and, most recently, on Samsung Galaxy S25 on the Verizon network as well as Comcast and Charter MVNOs, we have seen over three million activations on the Skylo system. In Europe, Skylo has established significant IoT partnerships with Deutsche Telekom, Telefónica Germany², and KPN. Furthermore, the recent announcement of Google's Pixel 9 series³, featuring satellite SOS capabilities in Europe, marks the introduction of the first direct-to-device satellite service in the region.

Transparency and Harmonization

We strongly endorse the Commission's proposal to promote transparency and harmonization of the regulatory framework for D2D services at the EU level. Establishing common requirements for market access and ensuring that the list of ECC Decision implementations remains up-to-date are crucial steps in creating a level playing field for all stakeholders. This will prevent regulatory fragmentation and streamline the process for operators to offer their services across the EU.

D2D-MES Services

Skylo agrees with the RSPG's assessment that there are currently no major hindrances that have been identified for D2D-MES services. Having been subject to the D2D-MES framework in EU Member States for the D2D, Skylo can attest that allowing various types of terminals and chipsets into the EU market is a positive step for companies like Skylo that have authorizations to provide D2D service in the majority of EU markets. Moreover, maintaining frameworks where D2D-MES use cases are mostly license exempt and having earth stations as generally licensed has facilitated the deployment of D2D-MES easier for companies like Skylo. Now that many companies are using equipment that is implementing 3GPP standards, particularly those using MSS bands, there is no need for EU-level intervention in the implementation of proprietary technologies in terminal equipment for D2D-MES services. Market forces should drive innovation and competition in this area, allowing for a diverse range of solutions to emerge and to be deployed in the EU. Skylo itself has a very robust and wide-ranging certification program that has resulted in most chipsets on the market being certified by Skylo, as well as modules and devices, which ensures that an ecosystem exists that meets the standards set for 3GPP NTN systems.

¹ <https://www.telekom.com/en/media/media-information/archive/telekom-and-partners-demonstrate-sms-via-satellite-1083916>

² <https://www.skylo.tech/newsroom/mobile-communications-via-satellite-o2-business-launches-first-tariff-for-satellite-iot>

³ <https://www.telekom.com/de/medien/medieninformationen/detail/telekom-und-google-testen-erfolgreich-sms-ueber-satellit-auf-google-pixel-9-1088714>

Radio Equipment

Skylo supports the RSPG's position that compliance with the Radio Equipment Directive (RED) is sufficient for radio equipment used in D2D services. Imposing additional requirements would create unnecessary burdens for manufacturers and could stifle innovation.

D2D-IoT-MSS Services

As a D2D-IoT-MSS operator in Europe, we concur with the RSPG's view that there is currently no need for EU-level engagement in the implementation of IoT in the allocated MSS bands, such as L-band and S-band. These bands are already well-suited for satellite-IoT applications, and market-driven initiatives should be allowed to flourish.

Conclusion

Skylo thanks the Radio Spectrum Policy Group for the opportunity to provide comments on this consultation. Skylo believes that a harmonized and transparent regulatory framework is essential for the successful development of the D2D satellite connectivity market in the EU. We commend the European Commission for its efforts in this area and stand ready to contribute to the ongoing discussions.

Sincerely,



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