



RSPG D2D Draft Opinion

Response from Vodafone / AST SpaceMobile

March 2025

Background

Vodafone Group (“Vodafone”) has been trialling live D2D services using AST SpaceMobile’s first commercial satellites¹, and plans to launch commercial services in Europe during 2025 / 2026. Vodafone and AST SpaceMobile are also creating a jointly-owned European satellite service business (“SatCo”) to serve other mobile network operators (“MNOs”) in all European markets². SatCo will seek to provide 100% geographic coverage of Europe, giving consumers and businesses access to secure space-based cellular broadband connectivity using everyday smartphones via their MNO. The closing of Vodafone and AST SpaceMobile’s investment in SatCo (and SatCo’s launch) is subject to any necessary legal and regulatory requirements, filings and approvals.

In this response, we seek to provide input on how national spectrum licensing authorities can support the provision of these services in Europe under the necessary safeguards. The views set out in this response reflect the common position of Vodafone and AST SpaceMobile operating independently.

National introduction of D2D-IMT

We support the RSPG proposal that services are **authorised as an integral part of the MNO’s terrestrial ECS licence** - which we expect to be more straightforward; ensures optimal coordination between terrestrial and satellite use; provides a single national point of contact in case there are any concerns with interference; and provides certainty in relation to compliance with national and European legal, regulatory and security requirements. Mobile IMT spectrum used for D2D services should be under commercial agreement with the MNO primary licensee partner.

Regulatory basis for introducing D2D-IMT

We support **the introduction of D2D-IMT services immediately**, on condition that services comply with all existing licence requirements with regard to avoiding harmful interference (as well as legal, regulatory and security requirements), and as supported under ITU RR 4.4, and welcome further clarification in WRC-27 agenda item 1.13.

In the interests of time, as well as best outcomes, Europe should seek to **harmonise the approach taken by national spectrum authorities, across Europe / CEPT**, according to the needs of European MNO providers and mobile customers, and then use that to shape and influence an ITU agreement that benefits Europe.

¹ [Vodafone makes world’s first space video call from an area of no coverage using a standard mobile phone and commercial satellites built to offer a full mobile broadband experience](#)

² [Vodafone and AST SpaceMobile Sign Agreement to Create European Direct-To-Device Satellite Service Provider](#)

Authorisation

We agree this could be achieved by **amendment of existing ECS authorisations** to include provision of D2D-IMT services.

Common requirements

We support:

- **Equal treatment** of satellite players operating in the EU market to ensure that legal and regulatory conditions apply equally to all telecom providers;
- **Protection of Member States'** satellite and terrestrial networks and EU satellite networks from harmful interference;
- **A level playing field** for electronic communications satellite constellations that protects European interests and innovation.

Creating a single market

We support the recommendations that:

- The EC issue a **mandate to CEPT under the Spectrum Decision to develop harmonised technical conditions for D2D-IMT satellite operations in ECS harmonised bands** addressing, as appropriate, protection of ECS networks and other radio services from D2D satellite operations. Such mandate should include a follow-up action further to WRC 27 in order to update the technical conditions if appropriate;
- This harmonisation process should nevertheless **not hinder the granting in the meantime of licences for commercial D2D mobile broadband services**;
- The European Commission consider proposing an **amendment to the current ECS harmonisation decisions** under the Radio Spectrum Decision based on the CEPT response to the Mandate **to enable the introduction of D2D-IMT under harmonised technical conditions**.

We also support the use of **2GHz MSS spectrum** to contribute to the **advancement of the European single market** for seamless and secure D2D mobile broadband services for Europe's c.450m mobile phone users.

Security

We agree that Member States should manage lawful intercept and national security issues and their compliance on a **sovereign national basis**.

Common European requirements

We agree that **common requirements** - and the potential for relevant collective actions (including relevant mechanisms to solve non-compliance), in the case that a breach of these requirements is not resolved at national level - **are preferred** over keeping the current status quo.