

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

28 March 2025

Viasat appreciates this opportunity to submit these comments in response to the Draft Opinion of the Radio Spectrum Policy Group (RSPG) on the “EU-level policy approach to satellite Direct-to-Device connectivity and related Single Market issues” (the “*Draft Opinion*”). Viasat supports Europe’s efforts to develop an environment to facilitate direct-to-device (D2D) communications, including as a part of enhanced Mobile Satellite Service (MSS) offerings. We believe that D2D has the potential to greatly expand connectivity by offering ubiquitous coverage and allowing uninterrupted mobile communications across Europe.

The European Union (EU) has set several connectivity objectives intended to enhance digital infrastructure and connectivity across its Member States. These objectives are aimed at fostering economic growth, ensuring social inclusion, and maintaining Europe’s competitiveness in the global digital landscape. Recent developments in the industry provide the EU with a golden opportunity to materially advance its pursuit of these objectives. In particular, recent standardisation efforts at 3GPP have enabled the combination of IMT and MSS technology within a single, mass-produced device (standard cell phone) readily available to the consumer and citizens of EU. The potential benefits that will flow from these efforts are substantial—but will only be fully realised if appropriate regulatory frameworks are maintained over time.

More specifically, it is essential that such frameworks fully harness the capabilities of MSS-based D2D without conflating it with other types of D2D that are more complex and potentially more problematic. Critically, *existing* regulatory frameworks should allow MSS-based D2D to accelerate the deployment of 5G networks across the EU (provided no action is taken to undermine those regulations). Within those existing frameworks, MSS spectrum can be used to provide additional capacity and coverage to all major socio-economic areas, including urban, rural, and transport routes, to ensure seamless connectivity and support for new applications. And within those existing frameworks, MSS D2D can provide additional resilience to existing IMT services. For example, in the event of natural disasters or emergencies, conventional communication infrastructure may be disrupted. MSS D2D can enable quick and reliable communication between devices, improving coordination for emergency services and disaster recovery efforts.

Viasat urges RSPG to recognise that in MSS spectrum D2D is the natural evolution of dedicated satellite phones that operate under the well-established GMPCS framework adopted by the ITU in 1996 and subsequently implemented by over 100 countries. Inmarsat, now Viasat, launched

its first satellite phone, the IsatPhone, in 2007. This marked the beginning of a new era in satellite communications, enabling global mobile satellite phone services for users in challenging locations and for emergency communications. The IsatPhone offers connectivity for voice calls and text messages, expanding communication options beyond traditional cellular networks. Emerging D2D services promise to take these valuable capabilities to the next level.

In addition to MSS D2D, MSS spectrum supports Europe's wider connectivity needs, including in-flight connectivity to hundreds of trans-European commercial airliners via Viasat's European Aviation Network (EAN). MSS facilitates the EU's sustainability efforts by enabling efficient monitoring of environmental data, such as air quality and climate change impacts, contributing to informed decision-making for policy and conservation efforts. Europe has extensive maritime and air traffic communications requirements. MSS enhances communication capabilities for ships and aircraft, improving navigation, safety, and operational efficiency while ensuring uninterrupted connectivity in these sectors. MSS connectivity can also significantly benefit the automotive industry in various ways, enhancing vehicle performance, safety, and user experience.

Viasat agrees with the RSPG's assessment that the current regulatory framework for MSS does not require any changes to enable the promise on MSS-based D2D, and will enable Europe to benefit from these new and enhanced services much faster than others. In fact, as regulatory certainty gives the industry the required reassurance to invest – it is important that the current framework remains as defined. For example, having harmonised and awarded to Viasat the 1980-1995 MHz and 2170-2185 MHz bands, as well as having implemented service and technology neutral regulation, the European Commission, its 27 member states and 16 non-EU countries will be able to benefit from MSS-based D2D much sooner than other countries.

MSS spectrum also has long been used to support voice (satellite phone such as the IsatPhone), messaging, emergency communications, tracking, monitoring and IoT services. Indeed, IoT services can and should be provided within existing MSS frameworks and need not be treated as a special category of service. The ability to use MSS spectrum to support IoT applications is particularly valuable given the growing emphasis on smart agriculture, smart cities, and environmental monitoring. Thus, MSS helps improve efficiency in resource management, such as precision farming and smart grid applications.

We urge RSPG to avoid drifting away from the service and technology neutral EU framework. We note that some satellite operators will only develop IoT solutions and will require much smaller amounts of spectrum to do so. Those applications will naturally thrive in band segments where other MSS services cannot operate as effectively due to lack of bandwidth. Work on these dedicated solutions is already taking place within CEPT FM44 and in the preparatory work to WRC-27. CEPT FM44 is developing harmonised conditions for SRD and IoT technologies communicating with satellites¹. At WRC-27 the ITU Members States will be concluding their work and considering proposals for additional spectrum for narrow-band applications.

¹ See ECC Work Programme here <https://eccwp.cept.org/default.aspx?groupid=19>

With respect to D2D services that utilise IMT spectrum, the situation is far more complicated including because such services *cannot* be simply offered within *existing* allocations and regulatory frameworks with minimal adjustments. We also invite RSPG to note that the use of IMT spectrum would pose a large number of issues that require careful analysis to properly inform the development of necessary regulatory frameworks and issuance of necessary regulatory authorisations. These include concerns about the potential for interference impacts on IMT and adjacent band MSS services arising from satellite services operating over IMT spectrum. Viasat urges RSPG to recommend to Member States that they ensure protection of those types of services, including those services operating in adjacent bands and neighbouring countries, before granting market access to satellite-based D2D using IMT spectrum, if the satellite network/system was notified under RR No. 4.4. Market access authorisations should be withheld or conditioned without approval until there is a complete interference analysis and review of that analysis from potentially impacted operators. Many of the coexistence issues are being addressed in the preparatory work for the WRC-27 Conference and RSPG should encourage that the CEPT mandate must start only after the Conference has concluded thereby avoiding creating a framework which will not be stable and hinder investment in innovative technologies.

In conclusion, based on the information provided above, we invite RSPG to recognise that there are two main approaches (using MSS and IMT spectrum) for satellite operators to provide D2D services and each presents different considerations from a regulatory perspective. We also invite RSPG to recognize that there are multiple spectrum bands already available and capable of providing a variety of services that will facilitate competition, including spectrum becoming available at WRC-27.

Respectfully submitted,

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