

Comments by Globalstar, Inc. on the Public Consultation on the Draft RSPG Opinion on the EU-level policy approach to satellite Direct-to-Device connectivity and related Single Market issues

28th March 2025

Introduction and Overview

Globalstar hereby submits its comments in response to the proposed Draft RSPG Opinion on the EU-level policy approach to satellite Direct-to-Device connectivity and related Single Market issues (RSPG25-008 FINAL), as published on the 12th of February 2025. Globalstar thanks the European Commission's Directorate-General for Communications Networks, Content, and Technology for the opportunity to comment, and for its diligent efforts to draft the published document.

Globalstar is a leading provider of global Mobile Satellite Services ("MSS"). Operating continuously in the S-Band and L-Band for more than 25 years, our low-Earth orbit ("LEO") non-Geostationary orbit ("NGSO") system supports the delivery of reliable MSS to consumers, public safety personnel, and enterprise customers globally. Globalstar currently operates a mobile satellite system composed of US-notified HIBLEO-4 and French-notified HIBLEO-X satellites. In addition to providing MSS to over 760,000 of its own customers worldwide, Globalstar supports revolutionary direct-to-device satellite features that are available to users of the iPhone 14, iPhone 15, and iPhone 16 family of devices. These features provide users with connectivity via satellite when no terrestrial connectivity is available. In Europe, Emergency SOS via Satellite is currently available in twelve (12) countries¹. In North America, non-emergency two-way messaging is currently also available.

Comments

1. D2D-IMT Services. Globalstar would like to express its support of the proposed RSPG recommendation to mandate CEPT to develop harmonized technical conditions for the introduction of D2D-IMT satellite operations in ECS harmonized bands. We would like to also propose that CEPT carefully assess and ensure the protection of other services operating in adjacent bands, whether satellite or terrestrial, along with those operating in-band.
2. D2D-MES Services. Globalstar strongly supports the RSPG recommendation that for services and systems "implementing [...] proprietary technologies in terminal equipment, there is no need to engage on EU level currently." As a long-time operator of MSS in globally harmonized bands and using ITU-level coordinated systems, we believe that the existing processes are sufficient to ensure the safe operations of D2D-MES across Europe. Should the Member States consider national spectrum licensing regimes and/or registries for better identification of satellite operators, we would like to suggest that these Member States espouse a light-touch approach so as to ensure that there are not overly burdensome requirements placed on operators.

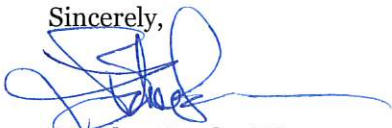
¹ Emergency SOS via Satellite is available in the U.S., Canada, France, Germany, Ireland, the U.K., Australia, Austria, Belgium, Italy, Luxembourg, Netherlands, New Zealand, Portugal, Spain, Switzerland, and Japan. See *Use Emergency SOS via satellite on your iPhone*, Apple, <https://support.apple.com/en-us/101573> (March 24th, 2025)

3. Access to National Markets (Common Requirements) and (Enforcement). Globalstar strongly supports the RSPG recommendation that there be common requirements in national authorization frameworks to ensure that duly coordinated and registered systems are able to continue operating safely within the spectrum environment across Europe. In particular, we support the recommendation that those systems operating under RR No. 4.4 be authorized on a non-interference non-protection basis only. Finally, Globalstar supports the RSPG recommendation that the European Commission consider an update of the EU legal framework to develop, amongst others, mechanisms to resolve cases of non-compliance to common requirements.
4. Radio Equipment. Globalstar agrees strongly that the RED is applicable, and that RED compliance is sufficient, and that no additional requirements are needed.

Conclusion

Globalstar would like to once again expresses its gratitude to the RSPG for its diligence and effort in developing the proposed recommendations as published in RSPG25-008 FINAL. These recommendations display a strong grasp of the multiple technologies supporting the emergence of "Direct-to-Device" services, features, and systems, and indicate a clear intent to both protect incumbent operators as well as foster continued technological innovations across Europe.

Sincerely,



L Barbee Ponder IV
General Counsel and Vice President of Regulatory Affairs