Intelsat welcomes the opportunity to respond to BEREC's consultation on the Work Programme 2022.

We have focused our response on section 1.6 "Report on satellite connectivity for universal service." Intelsat believes that the EU's future connectivity objectives, including as enshrined in the European Electronic Communications Code (EECC), to ensure "adequate broadband internet access service" requires the global connectivity infrastructure offered by the satellite communications industry. The provision of broadband internet to remote and underserved areas cannot be truly realized without broadband internet satellite communication (Satcom).

Intelsat therefore strongly supports BEREC's focus on a workstream that aims to understand what regulatory steps are needed if member states plan to use Satcom for universal service and how these plans may fit into current as well as projected Satcom capacities (geostationary as well as non geostationary). We look forward to engaging with the upcoming report and consultation on this matter.

**The role of satellite for universal access to internet services**

The connectivity challenge for the coming decade will not be accomplished by one technology alone. Satellite will play a unique role in ensuring near-ubiquitous, high-capacity and lower-latency communications and will be a key partner in helping the EU achieve its Digital Decade connectivity goals.

A more effective approach is needed to build a network that will meet the new bandwidth, coverage and reliability requirements. No singular solution can meet all the requirements alone, therefore the new network needs to be a combination of terrestrial and space-based platforms. Only satellite guarantees ubiquity and reliability for such a hybrid network. With innovations facilitating both launches and better antennas, satellite also provides lower costs and higher throughput, helping to remove dead zones, in particular important for rural areas in the EU.

The key point of departure for these innovations lies in establishing durable partnerships with industry, in view of seizing the benefits of existing technologies in the short-term, while boosting R&D in the long-term.

**Rural connectivity**

The work programme calls for the exploration of satellite communication (Satcom) as a solution to bring broadband internet to all parts of the EU, especially in remote and underserved areas. For remote areas, particularly in rural Europe, better technological solutions are required to ensure that all citizens can enjoy very good connectivity.

Satellite-powered mobile backhaul provides a wider, more flexible choice to achieve this vision. While fiber backhaul is ideal for urban and suburban network deployments, and microwave backhaul best supports suburban-rural edge expansion, satellite backhaul boasts unique advantages that make it a leading choice for rural mobile coverage.

**About Intelsat**

As the foundational architect of satellite technology, Intelsat operates the world's largest and most

advanced satellite fleet and connectivity infrastructure. For over 50 years, Intelsat has used its advanced, high-throughput satellite fleet to support broadband services in multiple industries, providing the expertise, quality, and cost-effective solutions organizations need to make their network services a success. Our satellite fleet serves as one vital part of our globalized network. Working in concert with terrestrial networking infrastructure and robust managed services, it enables resilient, cost-effective connectivity when and where it's needed most.

Intelsat looks forward to continuing its cooperation with BEREC and EU institutions in supporting Europe's connectivity objectives. We remain at BEREC's disposal to provide further information regarding the regulatory steps needed to enable the use Satcom for universal services.

Yours sincerely,

Intelsat