



Intelsat welcomes the opportunity to provide feedback on the draft BEREC Work Programme for 2023. We particularly welcome the continued focus on satellite services seen in the planned external workshop on secure and reliable connectivity in Europe from low earth orbit (LEO) satellite fleets although we believe that the workshop should not concentrate solely on LEO fleets but also consider MEO and GEO satellite fleets and/or a multiorbital approach.

As Intelsat had previously contributed to the public consultation on the Draft BEREC Report on Satellite Connectivity for Universal Service, we aim to continue providing assistance to BEREC where possible, based on Intelsat's experience as a leading satellite operator.

External workshop on secure and reliable connectivity in Europe from low earth orbit satellite fleets

The planned external workshop is a good opportunity to discuss the wider implications of non-geostationary constellations (NGSO) which are being launched globally and their impact on European regulatory frameworks.

Moreover, the Work Programme highlights the importance of analysing the new market dynamics resulting from the proliferation of NGSO systems. We consider that both the workshop and the market analysis should not concentrate on LEO fleets but also consider MEO and GEO satellite fleets and/or a multiorbital approach.

Intelsat has recently announced a new investment in boosting its fleet of satellites with new Low-Earth Orbit (LEO) or Medium Earth Orbit (MEO) satellites. This new investment will be part of a wider constellation of Software-Defined satellites that will be a critical part of 5G networks in Europe.

Combining a 5G core, cloud services, different bands and multiple orbits of today's satellite and terrestrial networks into one functioning system will set a new standard for resiliency, reliability, and reach.

To ensure that the workshop provides the desired results, the participation of the wider space ecosystem is needed, therefore we ask BEREC to include all relevant stakeholders in the discussion around this considerable issue. Intelsat's near 60-year experience as a satellite operator and the company's recent investment into NGSO systems can be of significant aid to BEREC in the upcoming work on these systems.

About Intelsat

Intelsat has more than 50 satellites in orbit providing satellite service to government and military end-users. We maintain the highest standards of security, building our infrastructure and networks against the most stringent international controls and systematically detecting, approaching and mitigating attacks. Intelsat's scale allows us to move much faster than government-owned initiatives.

Intelsat is headquartered in Luxembourg, from where we oversee 5 regional offices in Europe and deliver over 1,600 channels for our European customers. Our administrative headquarters are in Washington, D.C. Intelsat operates the industry's largest commercial teleport facility in Fuchsstadt (Germany), with USD 100m invested in the facility since 2002.

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