

15 August 2022

Submitted to: pm@berec.europa.eu

Re: EchoStar Mobile Limited Response to Draft Survey on Satellite Connectivity for Universal Service 22(83)

EchoStar Mobile Limited (EML) is providing comments in response to BEREC's Draft Report on Satellite Connectivity for Universal Service.¹ EML is an Irish company that holds a pan-European license for Mobile Satellite Service (MSS) in the S-band, with a complementary ground component in the 1980–2010 MHz and 2170–2200 MHz bands (2 GHz band).² EML, using its EchoStar XXI mobile service satellite, provides advanced, reliable mobile voice and narrowband data across Europe, including the most remote areas on land, at sea, and in the sky.

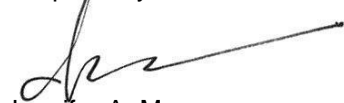
MSS systems, such as EML, are a critical component of our connected world and should be considered as part of the solution for the digital divide. Many customers turn to EML to provide connectivity at sea where terrestrial networks cannot reach. Pipeline operators use the network for real-time data reporting, its ability to control mechanisms remotely, and to provide voice and narrowband connectivity to workers in isolated areas. Utilities providers trust EML for remote monitoring of security and data related to the critical infrastructure that keeps the lights on and the taps flowing. And in emergency situations, first responders can trust EML's connectivity, even if terrestrial infrastructure becomes unreliable.

While these services illustrate the possibilities that arise from the ubiquitous coverage of satellite connectivity, upcoming technological advances will enable much more. For example, the inclusion of New Radio/5G Non-Terrestrial Networks (NR-NTN) standards in 3GPP Release 17 means that MSS networks, including EML's system, will be an even more important part of the 5G ecosystem. Release 17 opens the door for MSS chipsets to be included in smartphones.³ No longer will users require a special MSS device; instead, they will be able to use their Android, Apple or other mobile device to connect to satellite anywhere on Earth. The result will be ubiquitous global coverage for smartphones, smartwatches, and other connected devices employing 5G technology. EML and its affiliates have been active at 3GPP and plan to be at the cutting edge of this deployment with the planned deployment of their S-band Low Earth Orbit (LEO) wideband MSS system.

MSS systems, such as EML's planned wideband LEO system, are vital for achieving universal connectivity in Europe because they provide ubiquitous coverage in places that traditional terrestrial networks cannot. And with these systems being included in the 3GPP standard, they are able to provide anytime, anywhere communications on the same device used for day-to-day communications.

We appreciate the opportunity to comment and hope that BEREC and the Member States will include MSS as they consider ways to solve the digital divide and universal connectivity.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Jennifer A. Manner'.

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¹ Draft Report on Satellite Connectivity for Universal Service, BoR (22) 83, Annex 2: Questionnaire (June 9, 2022) ("Draft Report").

² Decision No 626/2008/EC of the European Parliament and of the Council of 30 June 2008 on the selection and authorisation of systems providing MSS.

³ Jaffar, M., & Chuberre, N. (2021, October). *NTN & Satellite in Rel-17 & 18*. 3GPP. https://www.3gpp.org/news-events/partners-news/2254-ntn_rel17.