

October 23, 2025

GSOA Contribution to the “Consultation Paper on Recommendation to Amend the License Classification Notice to Include Non-Terrestrial Networks and Services Licence and the Telecommunications (Fees) Regulations of the ECTEL Member States for Point-to-Multipoint Wireless Services

I. Introduction

GSOA appreciates the opportunity provided by the Eastern Caribbean Telecommunications Authority (ECTEL) to submit comments on the **Consultation Paper regarding the Recommendation to Amend the Licence Classification Notice to Incorporate Non-Terrestrial Networks and Services Licence and the Telecommunications (Fees) Regulations for Point-to-Multipoint Wireless Services in ECTEL Member States.**

GSOA commends the ECTEL for its forward-looking initiative to develop a regulatory framework for Non-Terrestrial Network (NTN) services applicable to providers of satellite telecommunications services directly to end users, including Fixed Satellite Services (FSS). This effort comes at an opportune time, as satellite-based broadband, 5G, and IoT connectivity are becoming essential to achieving universal, resilient, and inclusive connectivity in small island developing states.

NTN systems operating through non-geostationary and geostationary satellites can play a decisive role in bridging connectivity gaps, ensuring service continuity during natural disasters, and enhancing economic and social resilience across the Eastern Caribbean. In line with these objectives, GSOA hereby presents its feedback regarding the draft Recommendations that ECTEL has put forward to its Member States.

Recommendation 1 – Networks and Service Licensing:

1. GSOA commends ECTEL’s proposal to introduce a class license for NTN operators intending to provide telecommunications services directly to end users via non-terrestrial platforms. This would provide an efficient and proportionate approach to supporting market entry and fostering innovation. Furthermore, implementing a harmonized class license regime across ECTEL Member States would enhance legal and business certainty, encouraging investment, particularly among cross-border operators seeking regional authorizations.
2. GSOA, however, recommends that ECTEL implements streamlined procedures, including exempting NTN user-terminals from individual licensing, and removing any local entity requirements, or alternatively allowing a single local entity established in any ECTEL Member State to satisfy the local presence requirement for all countries within the ECTEL region. In this regard, GSOA recommends a blanket license approach for satellite user terminals, as called for in CITEL PCC.II Recommendation 68. These earth stations will come in a variety of devices, and so a blanket license regime focused on technically similar performance characteristics within a defined envelope will allow the market to adopt NTN services, which include Internet of Things, Direct-to-Handset, Direct-to-Vehicle and other use cases, more quickly. Minimizing administrative barriers will enable ECTEL Member States to facilitate the more efficient and timely deployment of non-terrestrial networks, as well as support resilient and inclusive connectivity.

3. For aviation and maritime applications, GSOA further notes that a differentiation is required with regards to regulating ESIMs mounted on board aircraft and vessels that are registered abroad, and which are only transiting or temporarily visiting the ECTEL Member States. ECTEL Member States already exempt foreign aircraft and vessels that have flag country approval, cause no interference, and avoid local network connections from licensing with prior approval. To accelerate deployment of visiting ESIM, GSOA encourages ECTEL to recommend a prior notification process instead. Under this approach, operators would notify Member States of their intent to serve visiting ESIM, and requests would be automatically approved after 30 days absent their objection. This change would expedite deployment and reduce administrative workload for Member States, who would retain oversight and the ability to request additional information if needed prior to operation.

Recommendation 2 – Regulatory Fees:

1. Regarding the fee structure proposed by ECTEL, GSOA wishes to emphasize that elevated regulatory fees tied to satellite services risks to substantially increase costs of providing NTN services within the ECTEL Member States, which will likely result in higher consumer costs. This will result in reduced affordability and could discourage further deployment of NTN, potentially limiting end users in these states from accessing the benefits provided by satellite services.
2. In order to support continued investment within the satellite industry, GSOA recommends that ECTEL implement a proportionate and regionally harmonized fee structure for the NTN class license based on administrative costs rather than by applying a percentage of the gross annual revenue of the NTN operator.
3. GSOA notes that NTN operators provide coverage on a global or regional scale, and only a portion of their total capacity may be utilized within a single ECTEL Member State. In light of this, GSOA respectfully recommends that licensing fees be correlated with the administrative burden associated with the licensing activities rather than being based on a revenue tax which would be passed on to customers in the ECTEL states, raising the costs of these services. It is advisable that fees correspond to administrative cost recovery and remain predictable, reasonable, and minimal, promoting both investment and innovation. This approach promotes fairness for smaller markets and helps to maintain service affordability and conforms with international best practices.

II. Conclusion

GSOA would like to thank ECTEL for recognising the important role that satellite communications can play in the region and the need for flexible, transparent and effective regulations to help ensure NTN network operators and service providers continue to offer multiple benefits to the businesses and the people of the region. GSOA appreciates the opportunity to contribute to this consultation paper and remains at ECTEL's disposal should there be any questions about this submission.