



Via Electronic Mail

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RE: ECTEL Consultation Regarding Recommendation to Amend the License Classification Notice to Include Non-Terrestrial Networks and Services Licenses and the Telecommunications (Fees) Regulations of the ECTEL Member States for Point-to-Multipoint Wireless Services

Kuiper Systems LLC (“Kuiper”), a wholly owned subsidiary of Amazon.com Services LLC (together, “Amazon”), appreciates the opportunity to comment on the Eastern Caribbean Telecommunications Authority’s (“ECTEL”) consultation document on *Recommendation to Amend the License Classification Notice to Include Non-Terrestrial Networks and Services Licenses and the Telecommunications (Fees) Regulations of the ECTEL Member States for Point-to-Multipoint Wireless Services*. We agree that Non-Terrestrial Networks (“NTNs”) can help to close broadband service gaps in the Caribbean region and that ECTEL’s recommendation to harmonize licensing across ECTEL Member States will facilitate the deployment of NTN services in those jurisdictions.¹

Amazon’s Project Kuiper will bring high-speed, affordable broadband to unserved and underserved communities around the world. Amazon began launching its constellation of non-geostationary satellite orbit (“NGSO”), Fixed-Satellite Service satellites in low Earth orbit (“Kuiper System”) in April 2025.² Since committing to invest over 10 billion U.S. dollars in the Kuiper System, Amazon has made significant strides toward further deployment, including the continued expansion of its terrestrial infrastructure and the unveiling of innovative customer terminals that will offer high performance in small form factors and at affordable price points. Amazon’s goal is to deliver service to select customers later this year as part of a commercial beta, and to roll out more widely as we launch more satellites and add coverage and capacity to the system.

Amazon supports ECTEL’s recommendation to establish a modern licensing framework for NTN services, including satellite broadband. To promote the widespread adoption of these services, ECTEL should promote service affordability by recommending that class license and annual spectrum fees be

¹ Amazon understands that, in the context of this consultation, NTN service means internet services provided by satellite or other non-terrestrial technology, including Fixed-Satellite Service (“FSS”).

² Amazon successfully launched Project Kuiper’s first 27 satellites on April 28, 2025. That mission was the first of more than 80 to deploy Project Kuiper’s initial constellation. *See Kuiper mission updates: Kuiper constellation expands with fifth successful launch*, Amazon (September 25, 2025), <https://www.aboutamazon.com/news/innovation-at-amazon/project-kuiper-satellite-rocket-launch-progress-updates>. Amazon has now successfully launched over 150 satellites, with additional launches planned in the coming weeks and months. *See id.*

based solely on the recovery of reasonable regulatory costs. Below, Amazon expands on this recommendation, as well as highlights other licensing best practices ECTEL could include as part of its recommendation.

I. Amazon Comments on ECTEL Consultation Document

Comments Regarding Recommendation 1 (Introduction of New License Category)

From Amazon's experience, licensing frameworks that provide regulatory certainty and promote rapid deployment create a positive investment environment that benefits end users. Amazon therefore supports ECTEL's effort to establish a harmonized licensing and fee framework to facilitate the introduction of NTN services, which has the potential to facilitate widespread access to broadband connectivity in ECTEL Member States.

In order to realize the full benefits of such a harmonized approach, Amazon encourages ECTEL to also recommend the following best practices to Member States, and incorporate such best practices into the draft Non-Terrestrial Networks and Services ("NNS") license that is attached to the consultation document at Annex 1, where appropriate:

1. **Enable online submission of applications, streamlining licensing processes.** Many regulators—such as in Argentina, Austria, Belgium, Colombia, Rwanda, and Singapore—allow applications to be submitted, processed, and modified online. Many also have online portals that facilitate filings, fee payment, and updates to licensee information. These online processes benefit operators and regulators alike as they improve transparency and accessibility, reduce administrative cost of the regulatory process, as well as streamline application review processes.
2. **Employ a blanket license approach for user terminals.** Blanket licensing enables the rapid introduction of communications equipment and is ideal in cases where the transmission equipment (*e.g.*, customer terminals) conforms to certain technical parameter(s) that ensure compatibility with potentially affected services operating in the same or adjacent frequency bands. This allows customers to install and operate terminals without site-specific coordination or individual antenna licensing. As outlined in CITEL Recommendation 68, blanket licensing regimes should cover customer terminals that can be operated on a fixed, nomadic, and/or earth stations in motion ("ESIM") basis. Licensing does not necessarily need to distinguish between the different uses for technically similar customer terminals as they are licensed on a ubiquitous basis.³
3. **Streamline license exempt operation for foreign-registered ESIM that are visiting/transiting.** ECTEL Member States 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, Amazon 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

³ See Comisión Interamericana de Telecomunicaciones Inter-American Telecommunication Commission, PCC.II/REC. 68 (XLIII-24), Guidance for Blanket Licensing Regimes for Ubiquitously Deployed Fixed Satellite Service (FSS) Earth Stations (2024), <https://www.oas.org/citevents/en/Documents/DocumentsFile/2804>.

States, who would retain oversight and the ability to request additional information if needed prior to operation.

4. **Adopt rules for ESIMs based on international technical and operating conditions.** Regulations for ESIM should align with ITU-R Resolution 123 (WRC-23), which establishes the technical and operational conditions for aeronautical and maritime NGSO ESIM in the Ka-band. Additionally, the European Conference of Postal and Telecommunications Administrations (“CEPT”) has recognized in ECC Decision (15)04 that land NGSO ESIM in the Ka-band can also co-exist with terrestrial services. Regulators are encouraged to consider the results of CEPT studies and permit the operation of NGSO land ESIM in line with the standards outlined in ECC Decision (15)04.⁴
5. **Eliminate or minimize localization requirements that impose market entry barriers.** Localization requirements, such as requiring in-country gateway stations or the deployment of other ground infrastructure locally, are unnecessary to meet lawful intercept or other policy objectives. Such requirements increase network inefficiencies and service and deployment costs, typically passed on to customers.
6. **Provide access to satellite bands that are critical for the provision of service, particularly in the Ka-band.** All Administrations in ITU Region 2 should allocate the 17.3-17.7 GHz band for FSS downlink operations to align with decisions at WRC-23 as well as CITEL PCC.II Recommendation 69, which recommends that CITEL Member States “facilitate the regional adoption of the use of the frequency band 17.3-17.7 GHz in the space-to-Earth direction for the operations of geostationary and non-geostationary satellite systems in the FSS.”⁵
7. **Streamline type approval and homologation procedures.** Mutual recognition of type approvals will accelerate the adoption of new technologies by consumers and simplify the regulatory process for all stakeholders. Regulators should establish frameworks for mutual recognition of type approvals issued by other countries or certificates from recognized international certification bodies, as it is done by countries in the EU, the United States, New Zealand, and Brazil, among others.
8. **Offer license terms of at least 10 years, which create greater regulatory certainty for satellite operators and service providers.** This regulatory certainty encourages greater capital investment in satellite networks and services, as companies can amortize costs over a longer period without fear of unexpected regulatory changes disrupting their operations.

⁴ See CEPT ECC/DEC/(15)04, Harmonised use, free circulation and exemption from individual licensing of Land, Maritime and Aeronautical Earth Stations On Mobile Platforms (ESOMPs) operating with NGSO FSS satellite systems in the frequency ranges 17.3-20.2 GHz, 27.5-29.1 GHz and 29.5-30.0 GHz (2015), <https://docdb.cept.org/document/447>; CEPT ECC Report 217, The Use of Land, Maritime and Aeronautical Earth Stations on Mobile Platforms Operating with NGSO FSS Satellite Systems in the Frequency Range 17.3-20.2 GHz, 27.5-29.1 GHz and 29.5-30.0 GHz (2015), <https://docdb.cept.org/download/1162>.

⁵ See CITEL PCC.II/REC. 69 (XLIII-24), Use of the Band 17.3-17.7 GHz (s-E) for Fixed-Satellite Service in Region 2 (2024), <https://www.oas.org/citevents/en/Documents/DocumentsFile/2805>.

The best practices above are consistent with numerous recommendations in the Inter-American Telecommunication Commission’s (“CITEL”) Technical Notebook on “Satellite Regulatory Frameworks and Best Practices.”⁶ Together, these recommendations enable new satellite broadband service models to emerge and thrive. This fosters competition and choice, ultimately benefiting the government, enterprise, and consumer customers in ECTEL Member States through improved services and pricing.

Comments Regarding Recommendation 2 (Fees)

To ensure that residents in ECTEL Member States realize the benefits of broadband connectivity, Amazon respectfully requests that ECTEL revise its proposed class license fee and frequency authorization fee schedules so that they are based solely on the recovery of regulatory costs—that is, the costs reasonably associated with regulatory licensing and oversight functions. Examples of countries that have reduced spectrum fees to support satellite services include Colombia, among others.⁷ Fees beyond cost recovery will unnecessarily increase the cost of operations for NTN service providers, potentially decreasing service affordability and discouraging deployment. This is particularly true in the context of NGSO satellite operations, which can require significant up-front capital and operational expenditures to design, build, and launch an NGSO constellation, as well as additional funds for ongoing research and development costs to improve service offerings across future generations.

II. Conclusion

Amazon expresses its gratitude to ECTEL for the opportunity to provide comments in response to this consultation, and welcomes further dialogue with ECTEL on these important issues.

Respectfully submitted,

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⁶ CITEL, Update Draft Technical Notebook “Satellite Regulatory Frameworks and Best Practices” (Aug. 4, 2025).

⁷ See, e.g., Colombia’s MinTIC Resolution 376, https://www.mintic.gov.co/portal/715/articles-198598_resolucion_00376_2022_v20220204.pdf.