



Managing Director
Eastern Caribbean Telecommunications Authority ('ECTEL')
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RE: Skylo Technologies Response to ECTEL's Consultation Paper on the *Recommendation to Amend the Licence 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*

Dear Managing Director:

Skylo Technologies, Inc. sincerely appreciates the opportunity to submit a response to ECTEL's Consultation Paper on the Recommendation to Amend the Licence 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 ("Consultation"). As government regulatory frameworks and spectrum planning are integral to the availability and success of Skylo's Narrowband Non-Terrestrial Network (NB-NTN) mobile-satellite service (MSS) business globally, Skylo commends ECTEL for its initiative to establish a streamlined regulatory framework that keeps pace with rapid advancements in satellite communication technology. These efforts are crucial to improve the quality of communication services in ECTEL countries, especially in underserved and maritime areas.

1. Introduction to Skylo Services

Skylo Technologies, Inc. ("Skylo") was founded to bridge coverage gaps, allowing standard cellular devices to transmit signals via satellite when out of range of traditional cell towers. Skylo's service provides network components that seamlessly extend the cellular experience,



ensuring continuous coverage if devices have a clear view of the sky. Currently, Skylo offers a real-time "direct-to-device" (D2D) service, spanning five continents, 37 countries, over 60 million square kilometres and with more than ten million activations.

This D2D NB-NTN service adheres to 3GPP Release 17 standards. Skylo's service utilises existing satellite infrastructure, specifically geostationary (GEO) satellites, though it is also compatible with low earth orbit (LEO) satellites. The service operates over dedicated, licenced MSS L- and S-band spectrum, enabling standard mobile phones, wearables, and Internet of Things (IoT) devices to connect directly to satellite to ensure ubiquitous communication.

Skylo's services are revolutionizing satellite connectivity globally, offering cost-effective, highly dependable, and universally accessible solutions. This is achieved through compatibility with common consumer devices like Google Pixel¹ and Samsung Galaxy S25² phones, as well as wearables such as the recently launched Google Pixel Watch 4 and Garmin fenix 8 pro smartwatch, both of which can connect directly to satellite services without a smartphone.³ Notably these devices are not using large swaths of spectrum (they use standard 2 x 200 kilohertz channels of spectrum), nor are they necessarily providing fast broadband speeds. They

¹ See:

<https://www.skylo.tech/newsroom/skylo-connectivity-enables-new-satellite-sos-feature-on-google-pixel-9-series> and <https://www.skylo.tech/newsroom/google-and-skylo-expand-satellite-connectivity-to-pixel-10-series-and-unveil-pixel-watch-4>.

² See: <https://www.verizon.com/about/news/verizon-skylo-launch-direct-device-messaging-customers> and <https://www.skylo.tech/newsroom/skylo-certifies-the-samsung-galaxy-s25-series-on-verizon>.

³ See:

<https://www.skylo.tech/newsroom/skylo-expands-collaboration-with-garmin-to-bring-satellite-connectivity-to-new-fenix-r-8-pro-smartwatches> and <https://www.skylo.tech/newsroom/google-and-skylo-expand-satellite-connectivity-to-pixel-10-series-and-unveil-pixel-watch-4>

are providing emergency services and connectivity to people who need to communicate when outside of terrestrial coverage. D2D services offer a crucial enhancement to connectivity across the ECTEL region, especially in areas where terrestrial networks fall short, and in geographies such as mountains or maritime where terrestrial networks are not economically viable. By providing reliable connectivity in these areas with limited or no coverage, D2D services can significantly improve emergency and disaster response. In fact, during and in the aftermath of recent emergencies such as hurricanes, floods and fires in the United States, Skylo has seen large spikes in usage of its D2D service because normal terrestrial systems are unavailable. In addition to emergency connectivity, D2D services also support IoT applications across industries like fishing, shipping, logistics, agriculture and weather prediction that are important to the ECTEL region.

By operating over standardised 3GPP Release 17 Narrowband-IoT (NB-IoT) cellular modems, Skylo benefits from significant economies of scale. This dramatically reduces deployment costs compared to traditional satellite phones, which are often based on proprietary technology and more limited in scale, and therefore more expensive. This cost efficiency allows D2D connectivity to be integrated into a wider range of devices, expanding its reach and impact across various sectors.

Furthermore, Skylo's adherence to 3GPP standards ensures full interoperability with the existing terrestrial mobile ecosystem. This allows satellite and terrestrial mobile services to function seamlessly, like standard roaming today. Since Skylo utilises existing GEO satellites in MSS spectrum bands, no new capital-intensive expenditures are required. This integration



simplifies the regulatory framework and provides a more cohesive and user-friendly experience for individuals and businesses alike.

Skylo has converged the NTN ecosystem: Satellite SOS & SMS on Android **today**

Chipsets	Certification Program	Phone OS Support	Network & Coverage
✓ ✓ ✓ ✓	✓ ✓ ✓ 		>10 Million Activated Users 37 licensed countries 8 Satellites / 10 Earth Stations 200+ Spot Beams / Channels 5 Continents Coverage: >60M km ²
Modules	Devices	Carriers	Exclusive Features
			Voice Calls AI Agents 3rd Party Apps

2. Skylo's Proposals Regarding ECTEL's Consultation

Skylo appreciates the changes suggested in ECTEL's consultation and has two primary proposals. The first is to make one class licence for non-terrestrial services applicable and available across all ECTEL member countries. One class licence for Non-Terrestrial Network (NTN) services across all ECTEL member countries would streamline the process for providers like Skylo. Instead of applying for a separate licence in each country, a single class licence would allow a provider to operate across the entire region. This would significantly reduce the administrative burden and cost for smaller companies such as Skylo enabling us to quickly deploy services and bring connectivity to underserved areas, including remote, rural, and maritime

regions. Because, by their nature, D2D NTN services rely on satellite beams that would cover the entire ECTEL area, having one class licence for all the ECTEL member countries would immediately bring the benefits of D2D connectivity to everyone in the Eastern Caribbean region.⁴

The second proposal addresses the financial viability of these D2D services. Skylo recommends that annual class licence fees be calculated using annual fees based on adjusted revenue (from within ECTEL member countries) rather than global revenue. This ensures that the fees are proportional to the actual economic activity in the region. If fees were based on a percentage of a provider's total global revenue, the cost of operating in these countries could become prohibitively expensive. This could force providers to withdraw services from the very areas that need them most, as the revenue generated in those specific regions might not be enough to justify the high licensing fees. In addition, usually satellite safety services are offered free of charge to consumers as part of a suite of services offered by a mobile network operator or a device manufacturer like Google Pixel phones, therefore there is a compelling public interest to encourage the deployment of such life-saving services in the ECTEL region, Tying fees to local revenue makes it more sustainable for providers to offer services in less profitable but socially critical areas.

⁴ An example of such an approach in a very large region is the pan-European authorisations issued by the European Commission for MSS in the S-band. The relevant legal framework is set out in 2007/98/EC: Commission Decision of 14 February 2007 on the harmonised use of radio spectrum in the 2 GHz frequency bands for the implementation of systems providing mobile satellite services, 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 mobile satellite services (MSS) and 2009/449/EC: Commission Decision of 13 May 2009 on the selection of operators of pan-European systems providing mobile satellite services (MSS).



3. Conclusion

Skylo looks forward to providing D2D NTN in the ECTEL region by making satellite connectivity affordable, reliable, and ubiquitous from the same devices that consumers have today. We appreciate the opportunity to contribute to this important consultation and commend the Authority's proactive approach in evaluating its satellite regulatory framework considering new and evolving technologies. We remain available to support ECTEL in finalizing this framework and would be pleased to conduct a video conference call at your convenience to further explain Skylo's service offering and our proposals detailed above.

Sincerely,

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