



NATIONAL
TELECOMMUNICATIONS
REGULATORY COMMISSION
ST. VINCENT & THE GRENADINES

October 23, 2025

Response to Consultation on Non-Terrestrial Networks and Services

Executive Summary

The NTRC of Saint Vincent and the Grenadines has reviewed the consultation document on Non-Terrestrial Networks (NTNs) and services. While we appreciate the effort to address emerging satellite services, we have identified several substantive concerns:

1. **Existing licensing frameworks are adequate** – Our current Internet Service Provider (ISP) licenses, particularly ISP Class 2, already accommodate the services described in the consultation, as demonstrated by SVG's successful licensing of an NGSO operator in 2025.
2. **Proposed fees may be discriminatory** – The minimum annual license fee of \$5,000 for NTN services and the spectrum pricing methodology differ from existing categories without clear justification.
3. **Incomplete regional analysis** – The consultation references Caribbean jurisdictions but omits relevant experiences from SVG and Dominica where NGSO operators are already licensed and operational.
4. **Definitional and categorization issues** – Key terms lack clear definitions, and proposed categories (PMP) overlap with existing classifications (LMDS).

This response provides detailed analysis of these concerns and recommendations for a more equitable and efficient regulatory approach.

1. Definitional and Scope Issues

1.1 Absence of Clear Definitions

Concern: The consultation document does not provide a clear definition of "non-terrestrial networks (NTNs) and services." Our Telecommunications Act similarly lacks this definition, which creates regulatory ambiguity.

Recommendation: We recommend that ECTEL develop and adopt a clear definition of NTN that distinguishes them from terrestrial services while acknowledging the continuity with existing satellite communications frameworks.

1.2 Historical Context of Satellite Services

Observation: The consultation treats satellite internet and direct-to-mobile satellite services as novel developments. However, these services have been available for decades through providers such as Globalstar and Iridium, both of which continue operations today.

Implication: Rather than characterizing these as "new services," the regulatory focus should be on whether existing frameworks adequately address current market dynamics and technological capabilities. In SVG's assessment, they do.

1.3 Incomplete Regional Analysis

Concern: While the consultation references how LEO satellite services are being addressed in various Caribbean jurisdictions, it does not reference the approaches taken in Saint Vincent and the Grenadines and Dominica.

Clarification: As noted on page 7, service providers have expressed interest in entering the ECTEL market. However, NGSO operators are already licensed and operating in at least two ECTEL markets, including SVG. This omission creates an incomplete picture of regional approaches.

Recommendation: The consultation should be updated to include case studies from SVG and Dominica, where pragmatic solutions have been implemented using existing regulatory frameworks.

1.4 Consideration of Satellite phones

Concern: There appears to be no explicit guideline on how devices such as satellite phones are regulated within our jurisdiction. In this context, can you advise whether the proposed amendment suggests that a person who wishes to use a satellite phone within the ECTEL jurisdiction would require the satellite provider to apply for an NTN license before they could use their service?

2. Existing Licensing Framework Adequacy

2.1 ISP Licenses Cover Proposed Services

Primary Concern: Section 4.6.4 (page 12) and the general consultation premise suggest that new licensing categories are necessary to accommodate NTN services. However, SVG successfully licensed an NGSO operator in 2025 using our existing ISP Class 2 license framework.

Analysis:

- The proposed Annex A for the new NTN license lists services that are identical to those already included in our current ISP Class 2 license Annex A
- Jamaica's approach, referenced in the consultation, uses their existing Internet Services License to cover these services
- If existing license templates already enumerate the relevant services, creating a new license category introduces unnecessary regulatory complexity

Key Question: If the consultation argues that new services require a new regulatory framework, how can all the license services listed in the proposed new license Annex A be found in existing ISP Class 2 licenses?

2.2 No Jurisdictional Restriction on ISP Licenses

Question: The consultation does not clarify whether ISP licenses are inherently limited to terrestrial services only. If there is no such restriction in the existing framework, what is the justification for creating a separate license category?

SVG Experience: Our regulatory practice demonstrates that ISP licenses can accommodate both terrestrial and non-terrestrial service delivery without requiring legislative amendments.

2.3 Unnecessary Amendment of License Classification Notice

Recommendation: Given that current license categories accommodate all services being offered in the market, including NGSO broadband services, we see no compelling need to amend the License Classification Notice to create a new category at this time.

3. Pricing and Fee Structure Concerns

3.1 Discriminatory License Fee Structure

Concern: Table 5 (page 16) proposes a minimum annual license fee of \$5,000 for NTN services. This requirement does not apply to any other current license category using the 3% of gross revenue model.

Assessment: This differential treatment may constitute discriminatory pricing without clear justification based on regulatory costs or market conditions.

Recommendation: License fees should be consistent across service categories that use the revenue-based model, or the consultation should provide clear rationale for differential treatment.

3.2 Spectrum Fee Methodology Issues

Concern: The NTRC cannot identify the rationale used to arrive at the proposed annual spectrum fees in Table 6. While the application fees align with existing license types and are acceptable, the annual spectrum fees deviate from established pricing methodologies.

Current Methodology: SVG's spectrum pricing has historically been based on:

- Covering regulatory costs
- Allocating the burden primarily to mobile service providers based on spectrum requirements and potential customer base

Recommendation: Annual spectrum fees should follow existing methodology for spectrum pricing until a comprehensive review of spectrum pricing is completed. This approach will:

- Ensure non-discriminatory pricing across service providers
- Maintain consistency with established regulatory principles
- Provide transparency and predictability for market entrants

3.3 Proposed Per-Customer Pricing Approach

Recommendation: We suggest calculating the average spectrum cost that mobile operators pay per customer and applying a similar amount for satellite operators offering broadband services directly to customers. This approach would:

- Ensure equitable treatment across technology platforms
- Reflect similar market dynamics and customer relationships
- Align with our established regulatory cost recovery principles

4. Technical Categorization and Spectrum Issues

4.1 Error in Spectrum Fee Table

Technical Issue: Table 6 (page 16) appears to contain an error in the first category of spectrum fees. It currently refers to bandwidth "greater than 10 MHz," which would encompass the other two categories in the table.

Correction: We believe the intention was to specify bandwidth "less than (<) 10 MHz" for the first category.

4.2 Overly Broad Spectrum Category Description

Concern: The spectrum fee category in Table 6 is very broad and makes no specific mention of non-terrestrial or satellite-based services. As written, it could apply to any entity offering point-to-multipoint service, regardless of technology.

Implication: If the intent is to create a category specific to satellite service providers, this should be clearly stated in both the description and naming of the category.

Recommendation: Revise the category description to explicitly reference satellite or non-terrestrial services to avoid ambiguity in application.

4.3 Overlap with Existing PMP Category

Concern: The proposal to create a new category labeled "PMP" (presumably Point-to-Multipoint wireless service) creates potential confusion, as we already have an existing category covering point-to-multipoint wireless service: LMDS (Local Multipoint Distribution Service), which is a fixed, wireless, point-to-multipoint technology.

Recommendation: If the intention is to create a category specifically for satellite providers, the naming should clearly reflect this distinction (e.g., "Satellite Point-to-Multipoint Service" or "Non-Terrestrial PMP Service") to avoid overlap with existing terrestrial PMP categories.

5. SVG Experience and Pragmatic Solutions

5.1 Successful NGSO Licensing in 2025

Saint Vincent and the Grenadines successfully licensed an NGSO operator in 2025 to provide broadband services directly to consumers using our existing legislative and regulatory framework. This practical experience demonstrates that:

- Existing ISP Class 2 licenses are adequate for authorizing NGSO operations
- No legislative amendments were required
- The regulatory framework provided sufficient flexibility to accommodate new market entrants

5.2 Interim Approach to Spectrum Categorization

While SVG did not face challenges in identifying an appropriate license type for NGSO operators, we did encounter questions regarding the most suitable frequency category for spectrum fee purposes.

Solution Adopted: We agreed to use the existing VSAT (Very Small Aperture Terminal) category on an interim basis, with the understanding that the spectrum fee regulations would be amended in due course to establish a more precisely tailored category and pricing structure.

Rationale: This pragmatic approach allowed for:

- Timely market entry for the operator
- Regulatory continuity and certainty

- Flexibility to refine the framework based on actual operational experience
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6. International Best Practices

6.1 Limited Scope of Comparative Analysis

Observation: The consultation primarily references approaches taken within Caribbean jurisdictions.

Question: What is the rationale for limiting the comparative analysis to Caribbean markets?

Recommendation: The consultation would benefit from examining regulatory approaches in other markets outside the Caribbean, particularly jurisdictions with more mature NGSO regulatory frameworks, such as:

- United States (FCC approach to LEO constellations)
- European Union (EU regulatory framework for satellite services)
- Other Commonwealth jurisdictions with similar legal frameworks

This broader analysis would provide additional perspectives on effective regulatory approaches and potential pitfalls to avoid.

7. Recommendations Summary

Based on the analysis above, the NTRC of Saint Vincent and the Grenadines recommends:

1. **Utilize Existing Licensing Framework:** Rather than creating a new license category, adapt existing ISP Class 2 licenses to explicitly accommodate NTN services if any clarification is needed.
2. **Develop Clear Definitions:** Establish clear, unambiguous definitions of "non-terrestrial networks and services" in consultation with member states.
3. **Adopt Consistent Fee Structures:**
 - Remove the minimum annual license fee requirement for NTN services to ensure consistency with other revenue-based licensing categories
 - Base spectrum fees on established methodologies, using per-customer cost analysis aligned with mobile operator pricing
4. **Correct Technical Errors:** Revise Table 6 to correct the bandwidth specification error and clarify category descriptions.
5. **Clarify Category Descriptions:** Ensure that any new spectrum categories explicitly reference satellite/non-terrestrial services to avoid overlap with existing terrestrial categories like LMDS.

6. **Expand Comparative Analysis:** Include case studies from SVG, Dominica, and relevant non-Caribbean jurisdictions to provide a more comprehensive regulatory landscape analysis.
 7. **Adopt Interim Flexibility:** Consider SVG's approach of using existing categories (e.g., VSAT) on an interim basis while developing more tailored frameworks, allowing for market entry without undue delay.
 8. **Conduct Comprehensive Spectrum Review:** Before implementing new spectrum pricing for NTN services, conduct a holistic review of spectrum pricing across all categories to ensure consistency and non-discrimination.
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8. Conclusion

The NTRC of Saint Vincent and the Grenadines supports the objective of establishing clear and effective regulatory frameworks for satellite-based services. However, we believe this can be achieved through adaptation of existing frameworks rather than creating new license categories.

Our practical experience demonstrates that current ISP licenses, properly applied, provide adequate authorization for NGSO operations. The proposed new licensing category risks introducing regulatory complexity without corresponding benefits, while the proposed fee structures raise concerns about discriminatory treatment.

We urge ECTEL to:

- Reconsider the necessity of a new license category given existing framework adequacy
- Ensure pricing mechanisms are consistent, transparent, and non-discriminatory
- Include comprehensive regional experiences, including those of SVG and Dominica
- Provide clear definitions and eliminate ambiguities in proposed categories

We remain committed to working collaboratively with ECTEL and fellow member states to develop regulatory approaches that facilitate market entry, promote competition, and serve the interests of consumers throughout the region.