



## **Iridium Comments: ICASA. Consultation on the Proposed New Licensing Framework for Satellite Services**

Iridium Satellite (Pty) Ltd (Iridium) respectfully submits these comments on the proposed new Licensing Framework for Satellite Services.

### **Section 6. Types of licenses/authorizations for Satellite Communications**

ICASA proposes two have three authorizations for satellite communications. In addition to the Satellite Gateway Earth Station Licence, which is currently provided for in ICASA's spectrum regulations, ICASA proposed a user-terminal network license and the registration of a space segment.

These proposed authorizations appear to complicate the current licensing framework and in some instances seem unnecessary. Currently, an individual electronic communications service (iECS) licence is required to provide service to end users in South Africa, and individual electronic communications network service (iECNS) required to provide the network used to provide iECS, and a spectrum licence to use the spectrum required to provide the iECNS and iECS.

Assuming the addition of the registration of a space segment will include the spectrum authorisation, the user-terminal network license seems to be necessary as it uses the same radio spectrum to communicate with the satellites. If the goal is to make sure specific frequencies bands are authorized, this can be addressed by issuing a spectrum authorization without creating an unnecessary burdensome licensing regime. In our view, the current licensing regime addresses NGSO licensing adequately, with the addition of the space segment authorisation.

### **Section 9. Satellite User Terminals**

The proposed blanket licensing of user terminals seems to be an unnecessary barrier to provide access to NGSO services to South African users. All equipment is currently required to be type approved, which is sufficient for having equipment circulate in the country. Adding another blanket authorization seems to be an unnecessary regulatory burden. A satellite operator obtains a network authorization, a service authorisation, and equipment is type approved. The terminal license seems to be redundant.

For satellite IoT services, the challenge of accurately tracking the number of terminals operating within South Africa at any point in time is considerable. Like many satellite operations, Iridium's services extend globally, with various industries—such as aviation, shipping, and logistics—relying on satellite IoT solutions. These devices are part of a global ecosystem, and tracking the exact number of terminals operating in any single country is highly impractical. Iridium does not sell capacity or services based on the number of terminals or messages, but rather provides global network access within the coordinated frequency spectrum. These operations have been adequately dealt with through the South African regulatory regime to date (iECS, iECNS, spectrum and type approval licensing). No additional licensing should be required.



## **Section 10. Space Segment Authorization**

Iridium fully agrees with the concerns raised in the consultation document regarding the potential reintroduction of landing rights, and believes that such a move would be a step backwards for South Africa's satellite communication framework.

Many countries have moved away from the landing rights licensing regime, recognizing that such a framework is overly burdensome and restrictive. The example of Brazil, which has one of the most complex satellite licensing frameworks in the world, illustrates how cumbersome such a system can be and the negative impact it can have on market access for satellite companies.

The landing rights regime prevents users in South Africa from enjoying critical satellite services because they are unusually complex, onerous, and unnecessary for global NGSO systems that are authorized by home administrations and coordinated with International Telecommunication Union. Most countries have changed their frameworks and abolished the landing rights licensing regime. On the contrary, the Brazil example is telling. The Brazilian framework is one of the most complex in the world, and presents a barrier for many satellite companies. There is no reason to go back in time and make access to NGSOs so complex that it would make South African market unattractive for NGSO operators.

Iridium does not have strong objections against the proposed space segment registration, however the existing network authorization regime seems sufficient. Any additional registrations or authorizations create additional obstacles and barriers for service/network operators and complicate the regulatory landscape unnecessary.

### **Conclusion**

Iridium supports ICASA's goal of developing a robust and efficient licensing framework for satellite services in South Africa. However, Iridium believes that the proposed additional authorizations for user terminals and space segment registration would create unnecessary complexity, regulatory duplication, and burdens for satellite operators. The current licensing regime, particularly for NGSO services, is already adequate to address the necessary spectrum and regulatory concerns. We recommend that ICASA carefully reconsider these proposals and seek a more streamlined approach that fosters innovation, investment, and access to critical satellite services for South African users.

Iridium remains committed to working with ICASA and other stakeholders to ensure a regulatory framework that promotes the growth of satellite communications and provides South African users with access to the best global satellite services.