



## **Hughes Network Systems, LLC Comments to the ITU Consultation on the GSR-21 “Regulatory uplift for financing digital infrastructure, access and use”**

The COVID pandemic has further demonstrated the need for prioritizing universal connectivity to broadband for work, education, health, government and socialization. However, significant funding is required to make access to broadband a reality and must be made on a technology neutral basis. To the extent that governments continue to make funds available to enable universal service and access to broadband, it is imperative that such funding be made available on a technology neutral basis, for wireline, terrestrial wireless, and non-terrestrial services — including satellite. For example, Hughes’ HughesNet satellite services provide 25/3 Mbps broadband services to users across the Americas today, primarily in rural and remote areas. Hughes’ planned Jupiter 3 satellite, which will be launched in 2022, will bring those speeds to approximately 100/20 Mbps to Hughes’ users throughout the Americas, no matter how remote the location.

Government investments should focus on extending connectivity on an affordable basis that enables access to the internet to everyone in both rural and non-rural areas on a technology neutral basis. Governments should avoid adopting unnecessary performance requirements that drive costs up for service unnecessarily. Business models that provide reasonable broadband services that also reduce deployment and operational costs must be included in the mix of broadband solutions to ensure affordability to broadband services. Satellite broadband services, such as HughesNet, is a good example, whereby the cost to deployment to rural and remote areas is not distance-based. This means that HughesNet can be deployed not only on a cost-effective basis, but because the satellite system is launched and operating, service can be provided to the end-user in a matter of days, not months or years.

To this end, it is critical that regulators support the wide range of connectivity technology options without strictly specific technical targets; many technological solutions have proven successful in enabling a range of essential digital services that people around the world have come to rely on - from streaming to video conferencing, to telehealth and more. Solutions and funding for broadband solutions need to be developed based on the specific requirements of the users, including the desired applications and geographic situations. Having artificial performance requirements will only increase costs and would fail to meet the real needs of

