

[gqr@itu.int](mailto:gqr@itu.int)

Cosmas Luckyson Zavazava  
Director  
ITU Development Sector  
Place des Nations  
Ch-1211 Geneva 20  
Switzerland

**Re: “Regulatory and economic incentives for an inclusive sustainable digital future”**

Dear Dr. Zavazava,

Intelsat hereby submits its views on the theme for this year’s Global Symposium for Regulators (GSR-23), on “Regulatory and economic incentives for an inclusive sustainable digital future”. The consultation focuses first on the deployment of digital infrastructure in rural and isolated areas, and secondly in the introduction of emerging ICT technologies and innovative business models.

**1. Streamlined, harmonized and simplified regulatory processes:** The telecommunications regulatory process should be streamlined, simplified and regularly reviewed to ensure it adapts to an evolving telecommunications environment. Additionally, regulatory harmonization on the frequency allocation and licensing process within regions and, where feasible, globally, will enhance regulatory certainty for global telecommunications deployment. As an example, technologies such as Earth-stations in motion (ESIMs) should be included in a country’s regulatory framework, in particular in the licensing procedures. These earth stations can operate, in the same frequency band, under similar technical and operational characteristics, allowing their licensing under a single blanket license regime, reducing the administrative burdens for both the national administrations and the applicants.

**2. Evidence-based market access regulations:** Regulations should balance the costs and benefits to impose regulation and introduce market barriers only when necessary to achieve a valid and well-defined objective. The rationale for any regulatory response to new technologies should consider the impact on consumers, market players, investment flows and national development. Appropriate authoritative benchmarks and metrics can guide regulators in rulemaking and enforcement, enhancing the quality of regulatory decisions. Lowering market access barriers will harness market competition, benefiting ultimately the final consumer. Regulators should especially consider streamlining the market access requirements when services are to be provided in rural or remote areas.

**3. Spectrum allocation:** Governments should ensure that there is sufficient spectrum available to support the deployment of satellite technology and satellite innovation, considering that satellite services are critical in connecting unconnected and isolated areas where it may not make economic sense to deploy terrestrial technologies. Satellite communications already provide affordable connectivity to countless underserved or unconnected customers around the world. Their continued deployment will help prevent the digital divide from becoming a chasm: a real risk as terrestrial-only 5G networks are currently planned mainly for densely populated areas. In order to continue to provide satellite services, policymakers should ensure regulatory certainty and availability of key

**Intelsat US LLC**

7900 Tysons One Place, McLean, VA 22102-5972 USA | T +1 703-559-6800 | [www.intelsat.com](http://www.intelsat.com)

satellite spectrum bands: L-, S-, C-, Ku- and Ka-band and looking to the near future the Q-V and E bands as well, considering that satellite operators do not have alternative frequency bands to which they can migrate to provide such services. Decisions must ensure that satellite communications can meet the demands of the communities and customers they serve, by maintaining and expanding access to harmonized satellite spectrum resources.

**Tax incentives:** Telecommunications entities may be reluctant to invest in more remote areas because their sparse population and low economic activity reduce profitability. Governments could offer tax breaks or other incentives to companies that invest in telecommunications infrastructure in remote areas, in order to reduce the cost of deployment. The tax incentives can include subsidies or rules that waive spectrum fees and taxes in exchange for providing service in rural areas. Lastly, as a general principle and a matter of good economic governance, regulatory fees should be kept to a reasonable level that allows governments to recoup administrative costs.

**5. Dedicated resources to satellite connectivity:** Both private and public stakeholders will need to prioritize funding for space programs in underserved countries. From a funding perspective, national authorities should ensure that infrastructure budgets have dedicated national space program allocations. International funding institutions like the World Bank and its private investment arm the International Financial Corporation can collaborate with governments, supplementing their space funding where possible.

**5. Universal Service Funds:** Governments could use universal service funds (USFs) to support the deployment of telecommunications infrastructure in rural and isolated areas. These funds are typically generated through fees charged to telecommunications providers and are used to support the development of infrastructure in areas where it might not otherwise be financially viable. To ensure the USFs are used effectively, satellite connectivity should be made eligible for funding. In addition, best practices in running USFs include the need to give USF autonomy and independence, clearly articulated objectives, neutrality, transparency, and accountability in service deployment as well as a fair and objective project selection and resource allocation process.

**5. Public-private collaboration:** Governments could work with telecommunications companies to develop public-private partnerships aimed at deploying telecommunications in rural and isolated areas. These partnerships could help to share costs and risks associated with infrastructure deployment. Different players in the value chain could collaborate and form partnerships to overcome the challenges associated with emerging ICT technologies. This could include partnerships between technology developers and infrastructure providers, or between large and small companies. Lastly, policy makers and regulators should work closely with industry stakeholders when developing regulatory frameworks through knowledge transfer and capacity-building.

**7. Affordable tariffs:** Although satellite services can be available anywhere, at any time, the different architectures of systems bear differing cost elements. The identification and billing of calls made in different contexts could require technical and operational agreements to lower costs and ensure that they are affordable and can be utilized by as many citizens as possible. Regulators can drive the affordability of connectivity by taking the appropriate regulatory decisions regarding interconnection fees, government charges, and transit charges. The introduction of special rates for local communications inside a country or community telecommunications centers may assist regulators in promoting affordable services in rural areas.

We hope that this information is helpful, and we remain at your availability for any further information or clarification.

Respectfully submitted,

Jose Manuel Toscano