



Amazon Response to ITU Global Symposium for Regulators Consultation

Amazon welcomes the opportunity to contribute to the Global Symposium for Regulators (GSR) consultation on Regulatory Governance Essentials. Informed by our commitment to expand access to broadband to communities around the world through our non-geostationary orbit (NGSO) satellite system Amazon Leo, we recognize the critical role that thoughtful, adaptive regulation plays in enabling innovative technologies to deliver meaningful connectivity to underserved communities worldwide.

The Baseline Toolkit for Digital Governance

Effective digital governance in the satellite connectivity sector requires regulators to move beyond traditional command-and-control regulatory frameworks toward outcome-based approaches that encourage innovation and flexibility while protecting the public interest and advancing user benefits. The core toolkit should include: clear and flexible authorization processes with transparent technical and operational requirements; flexible spectrum management frameworks that accommodate new technologies and sharing arrangements; streamlined coordination mechanisms for cross-border services; publicly accessible databases of licensed spectrum, and adaptive licensing conditions that can evolve with technological advancement.

Critically, regulators should establish a technology-neutral approach¹ to desired outcomes—such as coverage obligations, quality of service standards, and consumer protection—rather than prescribing specific technical solutions. This approach allows operators to deploy the most cost-efficient technologies while ensuring accountability for results. For satellite services specifically, governance frameworks should recognize the inherently international nature of space-based systems and incorporate mechanisms for regulatory cooperation from the outset.

Incentive levers are one method for encouraging private investment in connectivity infrastructure. These might include streamlined entry for operators committing to serve areas where connectivity is unavailable or are served by inadequate technologies, regulatory certainty through multi-year licensing terms, and recognition of voluntary industry standards and best practices. To extend coverage to rural and remote populations where legacy communications infrastructure may be unavailable or inadequate, regulators should consider regulatory sandboxes and pilot programs that allow controlled experimentation with new service models. Regulators should also consider allowing operators to offer flexible pricing so that they could discount plans in economically disadvantaged populations where service has historically been unaffordable.

Measurable and Enforceable Governance Across Sectors

To ensure governance essentials are both measurable and enforceable, regulators should anchor their frameworks in clear outcome metrics that reflect user experience and societal benefit. For connectivity services these metrics could address speed, latency, and service reliability thresholds (including geographic coverage). These metrics should account for the unique characteristics of terrestrial and space-based systems. Reporting frameworks for these metrics should be designed to provide regulators with necessary oversight while minimizing administrative burden on operators.

To enhance enforceability across sectors, regulators should develop harmonized data standards that allow consistent measurement and comparison. This is particularly valuable for satellite services that inherently cross jurisdictional boundaries. Regional and international harmonization of key metrics—such as how "broadband" is defined or how coverage is measured—would reduce compliance complexity while improving regulatory effectiveness.

¹ This does not mean that all regulation should be technology neutral, or ascribe to the so-called "same service, same rules" principle.
AMAZON.COM SERVICES LLC | 2121 7TH AVENUE N SEATTLE, WA 98121 | 1.888.280.4331



Predictable, Graduated Supervisory and Enforcement Pathways

A well-designed enforcement framework should be predictable, proportionate, and progressive, providing operators with clear expectations while protecting consumers and fostering competition. The pathway should begin with proactive guidance and transparency, including published regulatory expectations, technical standards, and compliance resources. Regulators should engage with industry during rule development to ensure requirements are technically feasible and economically viable.

When potential issues arise, the first response should typically be informal engagement and dialogue, allowing operators to explain circumstances and propose remedial actions. Formal remedies should be reserved for situations where informal approaches prove insufficient or where harm is significant. The framework should include clear criteria and sufficient timelines for resolution, allowing operators to understand what steps will restore good standing and create pathways for operators to demonstrate improved compliance.

The framework should also include escalation and de-escalation mechanisms. As operators demonstrate improved compliance, regulatory oversight should proportionately decrease. Throughout this process, due process protections—including rights to be heard, access to evidence, and independent review—are essential for maintaining legitimacy and fairness.

Cross-Border Cooperation and Regulatory Harmonization

The satellite industry illustrates the importance of international regulatory cooperation. NGSO systems provide coverage across multiple countries and continents from a single network architecture, making fragmented national regulations particularly challenging and detracting from the value of innovative technical solutions. Regulators should identify and adopt regional and international best practices for licensing and other regulatory frameworks and consider mutual recognition agreements for equipment certification and homologation to accelerate country entry and reduce duplicative processes. Joint supervision mechanisms for cross-border services could include information sharing among regulators and collaborative approaches to addressing interference or service quality issues.

Conclusion

The regulatory governance essentials for digital markets must balance the imperative to protect consumers and promote competition with the need to encourage investment and innovation in connectivity infrastructure. For satellite broadband services like Amazon Leo, this means outcome-focused frameworks that recognize the unique characteristics of space-based systems, proportionate oversight that provides certainty without excessive burden, and strong international cooperation that reflects the inherently global nature of satellite networks. We look forward to continued dialogue with regulators worldwide as we work together to bridge the digital divide and bring meaningful connectivity to communities around the world.