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Mr Dan Sjöblom

Director-General, Swedish Post and Telecom Authority and GSR-20 Chair

Global Symposium for Regulators

ITU Development Sector

Place des Nations

Ch-1211 Geneva 20

Switzerland

Re: GSR-20: The Gold Standard for Regulation

Dear Mr. Sjöblom:

Hughes Network Systems, LLC (Hughes), hereby submits its views on the theme for this year's Global Symposium for Regulators (GSR-20), the Gold Standard for Regulation. In these very trying times with the global pandemic, this year's theme is especially important to achieve the important goals of the United Nations and the ITU for sustainable, future proofed, connectivity for all.<sup>1</sup>

Hughes and its subsidiaries provide satellite broadband service throughout the Americas. Specifically, Hughes provides satellite broadband services throughout the United States as well as Latin America where it provides community wi-fi options for the most remote and hard to reach places at a reduced prepaid cost.<sup>2</sup> During the on-going COVID-19 pandemic, Hughes has provided consumer broadband services throughout the Americas to some of the hardest to reach areas so that everyone could stay connected for telehealth, telework, tele-education and more.

To achieve the goal of enabling the digital economy to grow sustainably and meet social goals, it is critical that regulation must be technology neutral. In a 5G and beyond world, it is critical that governments adopt regulations that are technology neutral and ensure that scarce resources, including spectrum and funding, are available on a technology neutral approach to maximize the ability to meet the needs of all users.

The need for technology neutral regulations is necessary for several reasons. First, no one or two technologies can meet all user needs and 5G recognizes that a network of network approach is important to meet all 5G goals including ubiquity and resiliency. Satellite is critical in rural and remote areas where it may not make economic sense to deploy terrestrial technologies. Satellite also has a critical role to play in national security, and disaster preparedness and response to create a sustainable and future proofed communications networks. As satellite is not a terrestrial-based technology, its ability to restore and maintain communications quickly and in a

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<sup>1</sup>See ITU-D, *Consultation for the GSR-20 Best Practice Guidelines Global Symposium for Regulators (GSR-20)*, BDT/DKH/RME/Dm/150 (Rel. 12 June 2020).

<sup>2</sup> Hughes is a subsidiary of EchoStar Corporation and sister company of EchoStar Mobile Limited who provides MSS S-Band services and holds rights to for a complimentary ground component in the European Union.

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cost-efficient manner is critical to the successful recovery of a hard-hit area by, for instance, a weather event. Further, with satellites' global coverage, satellite is particularly well positioned to provide constant connectivity for services on airplanes and vessels, as well as global services like M2M or IoT.

In addition, to increase access to broadband connectivity, funding is not only required to construct infrastructure, but there must be clear programs for education and adoption. One positive during the pandemic was that the need for access to broadband became clearer to large parts of the globe, whether it was for work, health, school, government or even socialization. In areas where broadband was available, subscribership increased, and satellite broadband providers were able to quickly establish broadband connections due to the always on nature of satellite. The concern is what happens when that period of intense need decreases, specifically, whether that level of connectivity will continue. To ensure the sustained levels of connectivity, there must be the support (both educational and financial) to keep all connected regardless of socioeconomic status or location.

None of this can occur without a neutral policy on spectrum allocation. While not all spectrum uses are equal, it is critical that governments do not sacrifice the availability of one service over the others. For example, in frequency bands that are sharable, regulators must make sure that the regulations governing sharing are not so extreme as to essentially block the use of the shared spectrum by one user, so the other has virtually unfettered use. In addition, there must be adequate spectrum made available for all future uses as to ensure sustainable social development as technology continues to advance. This means that governments need to allow a reasonable period of time for that technology to develop and put into use that spectrum. For example, while terrestrial technology development is relatively quick (a year or two), services like satellite, which operate in the hostile space environment, may take 5 to 10 years to develop reliable technology. But once that leap is made, the spectrum is used efficiently and with long term plans for meeting users' needs.

In addition, regulators must ensure for uses like satellite, there is global harmonization of the spectrum resource. Satellites, both geostationary orbit and non-geostationary orbit are inherently regional and global in their use. If spectrum is not available in the areas of coverage, it creates an economic disincentive for these systems to use these bands.

To meet the needs of the world in the next 20 years, it is critical that regulators adopt technology neutral regulations, including for funding and spectrum, to ensure that all services are available to users, whatever their needs and location. We are in a unique period in our world's history; the need for connectivity has never been higher. Working together industry and regulators can capture this moment and deliver a connected world.

We hope that this information will be helpful as GSR-20 grapples with this important policy issue. If you have any questions or need more information, please do not hesitate to contact me.



Respectfully submitted,

Jennifer A. Manner

Senior Vice President, Regulatory Affairs

Hughes Network Systems, LLC