

December 27<sup>th</sup>, 2025

To,

Joint Secretary (Telecom),  
Department of Telecommunications, Ministry of Communications,  
Government of India, Sanchar Bhawan, 20, Ashoka Road,  
New Delhi – 110001

*Attention: Davendra Kumar Rai*

**Subject: Submission by Globalstar, Inc. on the Draft Telecommunications (Sharing, Trading and Leasing of Spectrum) Rules, 2025**

Dear Sir,

We have enclosed submissions from Globalstar, Inc. on the draft Telecommunications (Sharing, Trading and Leasing of Spectrum) Rules, 2025, below, specifically outlined under Section 3 of this document.

Thank you for allowing us the opportunity to provide our comments on the draft rules. We hope that the inputs will be considered by the Department of Telecommunications, prior to finalizing the draft rules.

Sincerely,



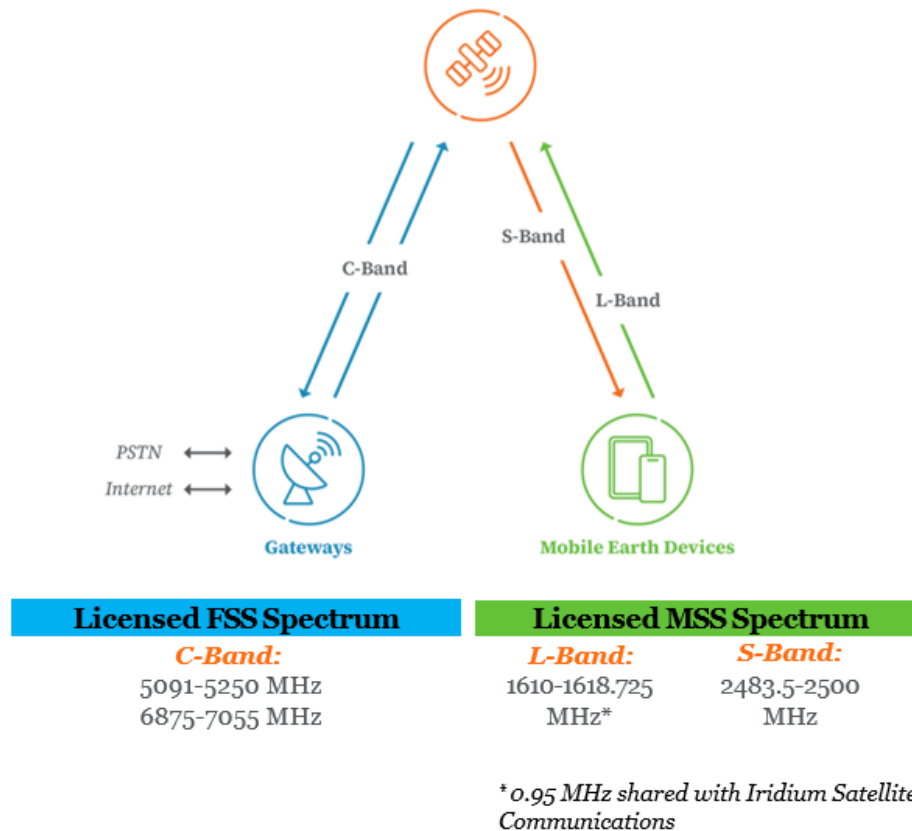
L Barbee Ponder IV  
General Counsel and  
Vice President of Regulatory Affairs  
Globalstar, Inc.

## 1. GLOBALSTAR, INC.

- 1.1. Globalstar, Inc. ("**Globalstar**") is appreciative of the opportunity to provide our submissions in relation to the draft Telecommunications (Sharing, Trading and Leasing of Spectrum) Rules, 2025 ("**Draft Spectrum Sharing Rules**") dated November 28, 2025, issued by the Department of Telecommunications ("**DoT**") under the Telecommunication Act, 2025 ("**Telecom Act**"), for public comments.
- 1.2. Globalstar is a US publicly traded company (NASDAQ: GSAT) duly registered in the State of Delaware. It owns and operates a Low Earth Orbit ("**LEO**") satellite system providing near global coverage, including India ("**Globalstar System**"). Founded in 1995, Globalstar has been providing mobile satellite services ("**MSS**") to the public for more than 20 years, having invested over US \$5 billion in its satellite network and ground operations during this period.
- 1.3. The Globalstar System consists of three separate components: (i) a constellation of LEO satellites, properly notified to the International Telecommunications Union ("**ITU**"); (ii) a global network of 28 gateway Earth Stations located in 18 countries; and (iii) mobile devices and terminals operating over Globalstar's MSS network, including those used by over 760,000 of Globalstar's own end-user customers in over 120 countries worldwide to meet their diverse communications needs.
- 1.4. As Globalstar grows its satellite communication business, it has embarked on a comprehensive global strategy to develop its direct presence along with ensuring regulatory compliance in numerous countries around the world. For this purpose, Globalstar has incorporated its subsidiary in India, and it is Globalstar's hope that this consultation process results in the DoT instituting regulatory reforms for satellite networks that will enable and support our entry into India, including from the perspective of bringing in ease and certainty of doing business in India for global companies such as Globalstar, and for the overall satellite communication services sector in India.

## 2. THE GLOBALSTAR SYSTEM

- 2.1. Globalstar operates a "bent-pipe" system with its satellites relaying messages between a global network of ground stations and millions of mobile earth terminals.



- 2.2. Globalstar's global MSS system supports reliable, essential services to consumers, public safety personnel, and customers covered by its network. Since initiating commercial MSS in 2000, Globalstar has focused on delivery of its MSS products and services to individual consumers and for the purpose of enabling commercial industrial applications. Reflecting its strong emphasis on the retail consumer market, Globalstar's MSS devices are easy to use and have long provided consumers with inexpensive, life-saving services across many countries globally.
- 2.3. For many years, Globalstar has been dedicated to providing state-of-the-art, mission-critical, and safety-of-life services in remote, unserved, and underserved areas not reached by terrestrial deployments. Globalstar's MSS network provides critical back-up capabilities for public safety personnel during disasters, when terrestrial networks can be rendered inoperable. In situations where all terrestrial wireless facilities are down in an affected area, Globalstar's global MSS network will continue to function normally. Public safety entities involved in relief efforts around the world have relied on Globalstar's satellite services after earthquakes, hurricanes, and other disasters.

Over the past 15 (fifteen) years, Globalstar has developed the affordable and innovative "SPOT" family of MSS devices, which has played a critical role in providing emergency and safety-of-life services to individual consumers beyond terrestrial wireless reach. SPOT products work virtually everywhere in the world, offering communication through satellite connectivity to hundreds of thousands of people who travel off the grid. In recent years, Globalstar's SPOT-X product has enabled two-way satellite communications, allowing, for example, remote workers to check in and provide detailed status of their situation when working at distant jobsites. Overall, as on date, the SPOT family of products is responsible for initiating over 10,000 emergency rescues via satellite in over 100 countries across six continents – often lifesaving, on land and at sea.

- 2.4. Globalstar has also developed an array of satellite IoT solutions for customers in a wide range of industries, including oil and gas, mining, construction, transportation, agriculture, emergency management, government, maritime, and commercial fishing. Globalstar's satellite IoT products allow enterprises to streamline their operations and intelligently manage, monitor, and track their mobile assets remotely via Globalstar's MSS network. Globalstar's commercial IoT products include its SmartOne asset tracking solutions and IoT satellite transmitters, which enable its customers to manage their remote assets utilizing motion sensors, comparative GPS positions, and custom-configured sensors. Globalstar complements its IoT devices with a centralized cloud-based platform that provides live or historical tracking of personnel, vehicles, and assets on-demand.
- 2.5. Globalstar provides wholesale B2B services to Apple to deliver transformational direct-to-device features for users of certain Apple devices. First introduced in November 2022, Apple's Emergency SOS via satellite feature allows users to initiate emergency communications through MSS transceivers contained in the Apple iPhone 14 and newer devices, as well as Apple Watch Ultra 3. As on date of this submission, this satellite-enabled feature is available in the US, Canada, 12 European countries, Australia, New Zealand, and Japan. Emergency SOS via satellite has led to numerous emergency and lifesaving rescues. In 2024, Apple also introduced two-way messaging via satellite in certain markets, allowing users in the United States, Canada, and Mexico to send messages via satellite to family and friends, including texts, SMS, emoji and tapbacks. These first commercially available direct-to-device satellite features have drawn a renewed focus on MSS spectrum, and the potential offered by satellite connectivity.
- 2.6. The availability of these direct-to-device satellite features along with other technological developments supporting the convergence of satellite and terrestrial services present substantial growth potential for MSS, and resultantly for consumers and businesses adopting these services for their purpose.

### **3. GLOBALSTAR'S SUBMISSION IN RESPECT OF THE SELECT ISSUES UNDER THE DRAFT SPECTRUM SHARING RULES**

#### **A. The sharing, trading and leasing of L, S and C spectrum bands should not be allowed under the Draft Spectrum Sharing Rules.**

1. Entities such as Globalstar provide critical mobile satellite connectivity, known as 'satellite safety services', which enable users to immediately connect with relevant public safety authorities in times of distress. These services play a vital role during emergencies and in remote areas where terrestrial networks are unavailable, facilitating communication with emergency response agencies, healthcare authorities, relief organizations, and personal contacts, as required depending on the emergency situation. Globalstar is keen on providing such satellite safety services in India. We wish to clarify that each satellite of Globalstar is equipped with multiple receivers and transmitters, and operates in the L and S bands, as well as in the C band for communications with the gateway earth stations. In particular, our gateway links and user links operate in the following frequencies:

<b>GATEWAY LINK AND USER LINK</b>	<b>FREQUENCIES</b>
User terminal to satellite (earth-to-space)	1610 – 1618.725 MHz
Satellite to user terminal (space-to-earth)	2483.5 – 2500 MHz
Gateway earth station to satellite (earth-to-space)	5091 – 5250 MHz
Satellite to gateway earth station (space-to-earth)	6875 – 7055 MHz

2. We understand that the DoT has issued the Draft Spectrum Sharing Rules with the objective of establishing a comprehensive framework governing the sharing, trading, and leasing of access spectrum, including those which have been assigned under the administrative process.
3. Given the emergency nature of our MSS services which delivers safety-of-life mobile satellite services over Big Leo MSS bands, we have previously requested (on October 17, 2024, and on subsequent occasions) for L and S, C band spectrum allocations to be made to licensed / authorized entities on an exclusive basis. Exclusive licensing terms are standard practice for this portion of the spectrum due to the nature of the user terminals. These user terminals are inherently mobile and typically employ omnidirectional antennas to ensure seamless connectivity regardless of the user's location. In this regard, if multiple operators were authorized to use the same frequencies bands within India, Globalstar's satellite network will be exposed to a significant risk of harmful interference. The consequence of such interference is particularly severe given the safety-of-life nature of Globalstar's services. As stated above, these services are relied upon for emergency communications where no territorial connectivity exists and any regulatory framework that permits spectrum sharing in L, S and C frequency bands will therefore introduce public safety risks. We have also highlighted that ITU adopts the same practice where it is keen on protecting the MSS frequency ranges and ensuring that it is free of any interference in its allocated frequency range, given their emergency SOS service.

Therefore, Globalstar has requested that both TRAI and the DoT adopt exclusive licensing terms within the Big LEO MSS bands and the associated feeder links for its Gateway frequencies.

4. In light of the above, we submit that the L, S and C frequency bands should be expressly excluded from the ambit and applicability of the Draft Spectrum Sharing Rules. Accordingly, the DoT is requested to reiterate the functionality of the MSS spectrums for abundant clarity, and consider including the following language in the Miscellaneous Chapter (Section 5) of the Draft Spectrum Sharing Rules –

***"Exclusion of certain frequency bands.***

*The provisions of these rules shall not apply to spectrum assigned or allocated in the L, S and C frequency bands for MSS services and/or communication."*

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