

March 24, 2026

To

**BRAZILIAN TELECOMMUNICATIONS AGENCY – ANATEL
SAUS – Block 6 – Blocks C, E, F, and H – South Wing
Zip Code 70070-940
Brasília/DF**

Subject: MSSA Response to ANATEL Public Consultation No. 8/2026

Dear Sir/Madam,

In response to ANATEL's Public Consultation No. 8/2026, the Mobile Satellite Services Association ("MSSA") writes to express its concerns regarding the proposal of AST & Science, LLC ("AST") to operate in MSS spectrum in the 1,995–2,010 MHz and 2,185–2,200 MHz bands, which are already assigned for use by other operators in Brazil.

MSSA is a non-profit industry association, founded in 2024, that seeks to promote and advance the emerging ecosystem for advanced Non-Terrestrial Network (NTN) services, including direct-to-device (D2D). MSSA supports the efforts of advanced NTN solutions providers, including terrestrial mobile and satellite operators, original equipment manufacturers, infrastructure providers, chip vendors, and others. MSSA is focused on facilitating a global ecosystem utilizing spectrum already allocated and licensed for Mobile-Satellite Services (MSS) and well-suited for integration into a broad range of mobile devices. More specifically, MSSA seeks to facilitate global mobile connectivity via satellite through open, standards-based solutions.

ANATEL notes in the consultation notice that coexistence between different MSS networks and systems operating in the same bands and covering the same regions can prove complex. MSSA believes this is a significant understatement of the challenges. It is widely recognized within the industry that co-frequency, co-coverage use of MSS spectrum

by multiple satellite operators is not technically or operationally feasible due to inherent technical and operational constraints.

MSSA further notes that the record does not include any substantive technical information demonstrating how AST's proposed operations could be implemented without causing harmful interference to existing MSS networks and systems. In the absence of such information, there is no technical basis upon which the feasibility of such coexistence can be reasonably established, nor a sufficient foundation to support the implementation of AST's proposed operations within the existing MSS framework.

Notably, MSS operators are already utilizing the 1,995–2,010 MHz and 2,185–2,200 MHz bands to support emerging NTN and direct-to-device (D2D) services within the globally harmonized MSS framework established under the ITU. This framework has enabled efficient spectrum use, supported substantial investment, and facilitated integration into mobile devices through evolving 3GPP NTN standards.

MSSA emphasizes that any proposed operations in these bands should not be allowed to compromise the reliable and interference-free operation of existing MSS networks and systems.

MSSA appreciates ANATEL's consideration and remains available to engage further.

Respectfully submitted,

/s/

Michele Lawrie-Munro
MSSA Executive Director
Mobile Satellite Services Association
5000 Executive Parkway, Suite 302
San Ramon, CA 94583
(925) 275-6673