

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of	)	
	)	
Kuiper Systems LLC	)	ICFS File No. SAT-LOA-20260601-
	)	00224
Application for Authority to Launch and	)	
Operate a Non-Geostationary Satellite Orbit	)	Call Sign S00917
System Providing Direct-to-Device Services	)	
(Amazon Leo D2D System)	)	

REPLY COMMENTS OF THE ASSOCIATION FOR COMPETITIVE TECHNOLOGY

I. Introduction and Statement of Interest

The Association for Competitive Technology (ACT) respectfully submits these reply comments on the application of Kuiper Systems LLC (Amazon Leo) for authority to launch and operate a non-geostationary satellite orbit (NGSO) system of 5,105 low Earth orbit satellites providing direct-to-device (D2D) mobile-satellite service (MSS), and on the associated requests for waiver.¹ ACT supports the application, joins the comments filed in support of grant, and urges the Space Bureau (Bureau) to grant it, together with the requested waivers, subject to any targeted conditions that the record shows are needed to protect other authorized users.²

ACT is a not-for-profit trade association representing the global small business technology developer community. Our members build software applications and connected devices used by consumers, businesses, and public institutions across the United States and

¹ *Space Bureau Accepts for Filing Amazon Leo NGSO D2D System Application*, Public Notice, DA 26-866 (SB rel. Aug. 18, 2026) (*Public Notice*); Kuiper Systems LLC, Application, ICFS File No. SAT-LOA-20260601-00224, Call Sign S00917 (*Application*).

² Comments of the International Center for Law & Economics, ICFS File No. SAT-LOA-20260601-00224 (filed Sept. 23, 2026) (*ICLE Comments*).

around the world, and they depend on reliable and widely available connectivity to reach their customers. Many of their products, including navigation and safety apps, fleet and asset tracking tools, agricultural and environmental sensors, and remote patient monitoring tools, are most valuable in the places where terrestrial mobile coverage is weakest. When a user moves out of range of a cell site, the app or device that a small developer built stops working, and the customer is unlikely to distinguish a gap in network coverage from a flaw in the product. ACT therefore has a direct interest in policies that extend mobile connectivity and in a spectrum framework that gives innovators of every size predictable access to the networks their products run on.³

II. Amazon Leo's D2D System Would Add Capacity and Competition That Small Developers and Their Customers Need

The Commission has recognized that consumers have benefited from the ubiquitous, and often lifesaving, connectivity that D2D service provides in areas with inadequate cellular coverage.⁴ In approving another provider's acquisition of dedicated D2D spectrum earlier this year, the Wireless Telecommunications Bureau and the Space Bureau also found that new D2D capacity can increase competition in retail wireless services and lower prices for consumers.⁵

³ See, e.g., Comments of ACT | The App Association, ET Docket No. 18-295, GN Docket No. 17-183 (filed May 26, 2022) (urging the Commission to reject unsubstantiated interference claims and bring finality to the 6 GHz proceeding to support Wi-Fi and IoT innovation); Notice of Ex Parte of ACT | The App Association, EA Docket No. 21-233 *et al.* (filed Sept. 24, 2021) (supporting the Commission's efforts to open more spectrum for both licensed and unlicensed use and to close the digital divide).

⁴ *Unleashing Unlicensed Spectrum for Direct-to-Device*, ET Docket No. 26-169, Notice of Proposed Rulemaking, FCC 26-51, ¶ 1 (rel. Aug. 7, 2026) (*Unlicensed D2D NPRM*).

⁵ Memorandum Opinion and Order, GN Docket No. 25-302, DA 26-471, ¶¶ 3, 43 (WTB & SB rel. May 12, 2026) (approving the assignment of EchoStar Corporation spectrum to Space Exploration Technologies Corp.).

Amazon Leo's system would extend those benefits by adding a D2D network designed to serve any compatible handset, regardless of manufacturer or carrier, and the record reflects support for granting the application on that basis.⁶

A market with several capable D2D providers matters to small developers because they design their products around the networks that consumers and enterprise customers actually use, and they benefit when carriers, device makers, and enterprise customers can choose among D2D providers that compete on coverage, capacity, reliability, and price. Additional capacity also widens what developers can build, since early D2D offerings centered on emergency messaging while newer systems are designed to carry voice, messaging, and data that can support a much broader set of applications, such as location sharing, connected vehicle and fleet services, and internet of things (IoT) monitoring in agriculture, energy, logistics, and healthcare. Amazon Leo describes its system as supporting these uses, including connectivity for worksites, fleets, and supply chains, and connectivity for government, public safety, and emergency services even under disaster conditions.⁷

The benefit is greatest in rural and remote communities, where Amazon Leo identifies persistent gaps in mobile coverage.⁸ Those gaps affect the small businesses that build products for farms, ranches, outdoor recreation, and rural healthcare, as well as the customers who use those products. D2D service that reaches ordinary handsets would let those businesses offer customers in hard-to-serve areas the same functionality that customers elsewhere already expect, without asking them to buy and carry specialized equipment. Amazon Leo also intends to

⁶ *Application*, Legal Narrative at 10; *ICLE Comments* at 2-3.

⁷ *Application*, Legal Narrative at 11-12.

⁸ *Id.* at 9-10.

operate the system together with Globalstar’s existing MSS systems once the Commission acts on the pending transaction between the two companies, which would put that MSS spectrum to more intensive use.⁹

III. Open Standards and Broad Device Support Will Keep the D2D Market Open to Developers

ACT gives particular weight to Amazon Leo’s plan to build its system on the 3GPP Non-Terrestrial Network (NTN) standards and the n254 band, so that service becomes available on compatible handsets as it scales and reduces the need for specialized equipment.¹⁰ Open, consensus-based standards let device makers and chipset suppliers design to a common specification, and they let app developers rely on consistent satellite connectivity across a wide range of devices and operating systems. A D2D ecosystem built in this way lowers the cost of entry for the small firms that ACT represents, which often lack the resources to build and maintain separate integrations for each network.

Broad device support should build on the satellite features that consumers already use. Globalstar’s network today supports emergency messaging, location sharing, and roadside assistance for millions of smartphone and smartwatch users, and Amazon has announced an agreement to continue powering those services on supported devices and to collaborate on future satellite services using the expanded network.¹¹ ACT encourages the Bureau to treat that

⁹ *Public Notice; Globalstar, Inc. and Amazon.com, Inc. Seek FCC Consent and Approval of the Proposed Assignment and Transfer of Control of Licenses and Authorizations Held by Globalstar to Amazon*, GN Docket No. 26-134, Public Notice, DA 26-550 (rel. June 4, 2026); *ICLE Comments* at 3.

¹⁰ *Application*, Legal Narrative at 10-11.

¹¹ *Id.* at 3-4; Amazon, *How Amazon Leo plans to connect mobile devices from space* (July 27, 2026), <https://www.aboutamazon.com/news/amazon-leo/amazon-leo-direct-to-device-satellite-service-explained> (last visited Oct. 5, 2026).

continuity as part of the public interest benefit of the application, since consumers who rely on these features in an emergency, and developers who have built services around them, are best served by a transition that keeps existing features working while new capabilities are added.

The same goal supports the requested waivers of sections 25.102(a), 25.115(a)(1)(i), and 25.115(d) of the Commission's rules relating to the licensing of user handsets.¹² D2D service delivers its full value only when consumers can use the devices they already own without a separate licensing step for each device, and ACT urges the Bureau to resolve the handset licensing question in a way that achieves that result.

IV. The Bureau Should Grant the Requested Waivers and Act Promptly, With Any Conditions Tailored to the Record

The Commission may waive a rule for good cause where particular facts make strict compliance inconsistent with the public interest and where the waiver would better serve the public interest than applying the rule.¹³ Amazon Leo's requests meet that standard, and several of them are structured so that they impose no new burden on other authorized users, such as the request to conduct certain V-band feeder link operations on an unprotected, non-interference basis.¹⁴ Where a party supports a concrete risk of harmful interference with technical evidence, the Bureau should address it through targeted conditions and coordination requirements, and it

¹² 47 CFR §§ 25.102(a), 25.115(a)(1)(i), (d); *see Public Notice; Application*, Legal Narrative at 13-14.

¹³ 47 CFR § 1.3; *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990); *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

¹⁴ *Application*, Legal Narrative at 5-6, 13.

should not deny or delay the application on the strength of claims that are speculative or unsupported, as another commenter has also urged.¹⁵

Amazon Leo has committed to protect in-band users and to manage its emissions to mitigate risk to adjacent-band operators. It also proposes to confine its uplink operations in the 1618.725-1621.35 MHz band outside the United States to jurisdictions where Iridium is not authorized to operate, consistent with the Space Bureau's April 2026 order confirming operators' rights in the 1.6/2.4 GHz MSS bands.¹⁶ These commitments give the Bureau a sound basis to grant the application while preserving the investment-backed expectations of incumbent operators.

In the United States, Amazon Leo proposes to provide its service links within the existing MSS allocations at 1610-1618.725 MHz and 2483.5-2500 MHz, and the application does not ask the Commission to change the rules that govern unlicensed Part 15 devices in the adjacent 2400-2483.5 MHz band.¹⁷ ACT members rely on that band for the Wi-Fi and Bluetooth connectivity built into nearly every product they make, and the Commission has stated in its pending unlicensed D2D proceeding that it intends to preserve the operational status quo for the terrestrial Part 15 devices that consumers and businesses rely upon every day.¹⁸ Granting the application on the terms Amazon Leo proposes is consistent with that commitment, and ACT asks that any grant confirm that it does not alter the rules governing Part 15 operations in the 2400-2483.5 MHz band.

¹⁵ *ICLE Comments* at 4-5.

¹⁶ *Application*, Legal Narrative at 8, 12; Order, GN Docket No. 23-135 *et al.*, DA 26-398 (SB rel. Apr. 23, 2026).

¹⁷ *Application*, Legal Narrative at 5, 12.

¹⁸ *Unlicensed D2D NPRM* ¶ 4.

ACT also urges the Bureau to act on the application promptly because Amazon Leo plans to begin deploying satellites in 2028¹⁹ and the manufacturing, launch, and international coordination work that precedes deployment depends on regulatory certainty. Prompt action would also allow carriers, device makers, and developers to begin planning products and services around the system, which is how the benefits of new D2D capacity will reach consumers soonest.

V. Conclusion

ACT appreciates the opportunity to submit these reply comments and urges the Bureau to grant the Amazon Leo D2D System application and the associated requests for waiver, subject to any targeted conditions that the record supports.

Respectfully submitted,

/s/ Brian Scarpelli
Brian Scarpelli
Senior Global Policy Counsel

Chapin Gregor
Global Policy Counsel

Association for Competitive Technology
1401 K St NW (Ste 501)
Washington, DC 20005
202-331-2130

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¹⁹ Amazon, *How Amazon Leo plans to connect mobile devices from space*, *supra* note 11.