



Draft Decision on

Direct-to-Device Mobile Satellite Service

Inviting public comment and input

May 22nd 2026

INTRODUCTION

- 1 The Telecommunication Regulatory Authority (TRA) **is seeking your feedback** on whether we should amend the Spectrum Licensing Rules and the Schedule of Fees Rules to add a new category of frequency license and associated license fees, respectively, to support the introduction of direct-to-device (**D2D**) mobile satellite services in the FSM.
- 2 The purpose of making these amendments is to encourage efficient and sustainable investment in and use of communications networks and services, to promote the effective and efficient use of spectrum, and to extend access to communications services to all persons in the FSM.
- 3 Our preliminary decision is that we should amend the Spectrum Licensing Rules and the Schedule of Fees Rules as set out in **Attachment 3** and **Attachment 4**, respectively, of this Draft Decision. Our draft determination is set out in **Attachment 2** of this Draft Decision.
- 4 The purpose of this consultation is to gather and consider public comments, so we can consider stakeholders' views before we decide to amend the Spectrum Licensing Rules and the Schedule of Fees Rules.

CONSULTATION FEEDBACK INFORMATION

- 5 The TRA invites written comments and feedback on this consultation document. We have provided a comments form for responses, which can be found in **Attachment 1**.
- 6 Responses may be submitted in person at TRA's offices in Pohnpei, or sent to consultations@tra.fm. Responses are due by 5:00 PM on June 22nd 2026.
- 7 Submissions will be made public, unless there is a specific request for confidentiality made under Section 322 of the Act.¹
- 8 After receiving feedback, we will publish the submissions, and our response to submissions which will state our views and reasons for either making changes or maintaining our initial views.

BACKGROUND

- 9 The objectives of the FSM Telecommunications Act of 2014 (**the Act**) include "*promoting the long-term interests of users,*"² "*providing conditions for effective competition among service providers in the Federated States of Micronesia and encouraging efficient and sustainable investment in and use of communications networks and services,*"³ "*promoting*

¹ See the comments form (Attachment 1) for details.

² Section 303(1)(a) of the Act.

³ Section 303(1)(c) of the Act.

the effective and efficient use of the radio frequency spectrum,”⁴ and “extending access to communications services to all persons in the Federated States of Micronesia, to the greatest extent reasonable in the circumstances.”⁵

- 10 Our functions and powers under the Act include the powers to “manage the radio frequency spectrum required to provide communications services,”⁶ “undertake consultations on matters relating to communications,”⁷ and “make rules and regulations as provided for under the Act.”⁸ These powers include, in particular, the power to make spectrum licensing rules relating to the use of radio frequency spectrum⁹ and the power to make rules specifying annual fees for spectrum licenses.¹⁰
- 11 We are now considering whether we should exercise those powers to make rules authorizing the grant of frequency licenses for communications services provided from satellite networks directly to mobile handsets in the FSM and the appropriate spectrum license fees for those licenses.

DIRECT-TO-DEVICE MOBILE SATELLITE SERVICES

- 12 Cellular mobile networks have expanded over the last few years to reach most people. Globally, 98 percent of the world’s population has access to 2G or better services.¹¹ We estimate that in the FSM, cellular mobile networks now cover approximately 54 percent of the population.¹² However, some people remain outside cellular mobile network coverage areas for various reasons such as geographic remoteness, the difficulty or the cost to establish a cell site, or the difficulty in providing electric power to that location.
- 13 Services based on new technologies are emerging which have the potential to fill in those last few coverage gaps in underserved or unserved areas. These include “direct-to-cell” or “direct-to-device” (**D2D**) mobile satellite services¹³ which leverage the coverage offered by satellite services to deliver mobile services directly to the mobile phones or other handheld devices used by consumers and businesses.

⁴ Section 303(1)(h) of the Act.

⁵ Section 303(1)(i) of the Act.

⁶ Section 305(i) of the Act.

⁷ Section 305(n) of the Act.

⁸ Section 305(p) of the Act.

⁹ Section 333 of the Act.

¹⁰ Section 336 of the Act.

¹¹ ITU Facts and Figures, Mobile Network Coverage. <https://www.itu.int/itu-d/reports/statistics/2024/11/10/ff24-mobile-network-coverage/>

¹² TRA estimate based on FSMTC mobile coverage maps and 2010 census population data of islands with mobile service.

¹³ Direct-to-device (D2D) services are voice, SMS and/or data services delivered from satellites to end-user mobile handsets.

- 14 There are two primary technological approaches to delivering these D2D services.¹⁴
- 15 The first is centered on terrestrial cellular mobile¹⁵ networks. Under this approach, a terrestrial cellular mobile network operator typically partners with a satellite network operator to allow the latter to use a portion of the cellular mobile spectrum licensed to the former to send communications to and from the satellite to the consumers' mobile phones. The consumer does not need a specially-equipped phone because standard cellular mobile frequencies are used, but the cellular mobile network operator must have spectrum available and the satellite network operator needs to have a commercial relationship with the cellular network operator.
- 16 A number of jurisdictions have authorized this form of D2D services, including Australia,¹⁶ Canada,¹⁷ New Zealand,¹⁸ the United Kingdom,¹⁹ and the United States.²⁰
- 17 The second is based on mobile-satellite service (**MSS**)²¹ networks, where the satellite network operator uses the MSS spectrum that it is authorized to use, rather than cellular mobile spectrum, to send communications to the consumers' mobile phones. This requires the consumer to have a specially-equipped phone (i.e., one that can support MSS frequencies). Whether the satellite network operator serves consumers directly or enters into a commercial resale arrangement with a cellular network operator will depend upon the business model adopted by the satellite network operator.
- 18 In our Consultation Paper,²² we considered that this second form of D2D service offers great potential for the FSM. It appears to provide a way to extend mobile communications services to areas and to people who have to-date been unserved or underserved by terrestrial cellular mobile networks, including many of the outer islands of the States of the FSM. It would also improve the reliability and resilience of mobile services offered in the FSM.
- 19 However, at the present time, our Rules do not include a category of frequency license or station license that would support this D2D service. As it is a satellite-based service, it would

¹⁴ See for example GSMA Public Policy Paper "Spectrum for D2D: The Use of Satellite to Supplement Mobile Coverage" (October 2025). https://www.gsma.com/connectivity-for-good/spectrum/gsma_resources/spectrum-for-d2d-public-policy-paper/

¹⁵ Also known as International Mobile Telecommunications (**IMT**).

¹⁶ See <https://www.acma.gov.au/consultations/2023-11/satellite-direct-mobile-services-regulatory-issues>

¹⁷ Industry, Science and Economic Development Canada, *Decision on a Policy, Licensing and Technical Framework for Supplemental Mobile Coverage by a Satellite*, SMSE-001-25, February 2025.

¹⁸ See <https://www.rsm.govt.nz/licensing/direct-to-device-licensing>

¹⁹ Ofcom, *The final regulations for the authorisation of satellite Direct to Device services*, Statement, February 17, 2024.

²⁰ Federal Communications Commission (**FCC**), *Single Network Future: Supplemental Coverage from Space*, GN Docket No.23-65, IB Docket No. 22-271, Report and Order and Further Notice of Proposed Rulemaking, FCC-24-28, March 15, 2024.

²¹ Mobile satellite services (MSS) are satellite services that provide two-way voice or narrowband data communications to users typically on the move or in remote locations. D2D services are a subset of MSS services, as the latter connect to a broader range of mobile or portable terminals, such as terminals on aircraft, ships or other vehicles, or handheld satellite phones. D2D services are intended to connect to consumer cellular mobile handsets.

²² Telecommunication Regulation Authority, *A Consultation Paper on Direct-to-Device Mobile Satellite Service*, published February 17, 2026 (**Consultation Paper**).

not fit within the existing Cellular Mobile Service Frequency License category and, as it appears to require the exclusive assignment of a frequency range in order to prevent harmful interference, it does not fit within the Satellite Earth Station License contemplated by the Spectrum Licensing Rules. Nor do we have a frequency license fee category that would apply to the spectrum used to provide this D2D service.

- 20 We proposed in our Consultation Paper, therefore, to exercise our powers to make spectrum licensing rules under section 333 of the Act and to make license fee rules under section 335 of the Act, by adding a new category of frequency license and a new set of license fees, as further described below. We intend to exercise these powers in order to support the introduction of MSS-based D2D services, which will encourage efficient and sustainable investment in and use of communications networks, promote the effective and efficient use of spectrum, and extend access to mobile communications services to all persons in and to all areas of the FSM, to the greatest extent possible.
- 21 For greater clarity, we are not proposing to amend the spectrum licensing rules to introduce other frequency or station licenses for other types of MSS licenses or other types of satellite service licenses at this time. If we do so, we would conduct separate consultations on those matters.

PROPOSED CHANGES TO SPECTRUM LICENSING RULES

- 22 Accordingly, we proposed in our Consultation Paper to amend the Spectrum Licensing Rules by adding a new category of frequency license. This amendment would involve inserting a new section in Schedule 1 of the Spectrum Licensing Rules between the existing *Section 2 – Cellular Mobile Service License* and *Section 3 – Fixed Service Licenses*.
- 23 A draft of the proposed new section is attached as **Attachment 3**. We strongly recommend that you review that Attachment, and not simply rely on the description below, when submitting your comments.
- 24 Spectrum licenses for satellite services are often issued as station licenses²³ (e.g., satellite earth stations). However, because the D2D service is very similar to cellular mobile service, and because it is more practical to grant exclusive use of a frequency range to a single licensee for a service of this nature, we proposed in our Consultation Paper to introduce a frequency license²⁴ for the D2D service.
- 25 This new category of frequency license would grant licensees the exclusive use of certain MSS frequency ranges to provide D2D services. Because the service is similar to cellular mobile service, we considered that the MSS frequency ranges used for D2D services have or may have high economic value, and that it is not practical for multiple D2D service operators to share the same frequency range. As a result, we considered that any relevant spectrum should be awarded pursuant to a Request for Applications (**RFA**) under section 17

²³ Defined in section 13(1)(b) of the Spectrum Licensing Rules as a license “authorizing Licensees to install, establish and use the Radio Apparatus and use Radio Frequency spectrum.”

²⁴ Defined in section 13(1)(a) of the Spectrum Licensing Rules as a license “authorizing Licensees to use specific Radio frequency blocks or particular frequencies.”

of the Spectrum Licensing Rules (instead of on a first-come, first-served basis under section 16).

- 26 Similar to the Cellular Mobile Service Frequency License, this new category of frequency license would authorize the deployment of an unlimited number of end-user terminals (e.g., mobile handsets) without requiring individual authorization of that radio apparatus through station licenses. However, other types of earth stations would continue to require authorization under individual station licenses.
- 27 Because of the space-based nature of the technology used to deliver the service, we proposed to grant licenses for the use of the relevant spectrum across the entire territory of the FSM and not in individual States (unlike in the case of Cellular Mobile Service Frequency Licenses).
- 28 In order to promote the timely deployment of services and use of the spectrum, we proposed to require the applicant to demonstrate that it is either a satellite network operator or has a commercial arrangement with a satellite network operator for access to a satellite or satellite system that has been duly filed with the ITU, that uses the relevant frequencies, and whose service area includes the FSM.

PROPOSED CHANGES TO SCHEDULE OF FEES RULES

- 29 In our Consultation Paper, we also considered that we need to establish a new frequency license fee that would apply to the spectrum used to provide this MSS-based D2D service.
- 30 We considered that the proposed D2D Mobile Satellite Service is similar to the Cellular Mobile Service, as both provide mobile communications services directly to the mobile handsets of users, although the former relies on transmissions to and from satellites while the latter relies on transmissions to and from terrestrial cell sites.
- 31 Because of this similarity, and in order to promote equitable competition among different providers of mobile communications services, we considered that licensees of D2D Mobile Satellite Service spectrum should pay the same spectrum license fees as holders of Cellular Mobile Service Licenses for similar amounts of spectrum.
- 32 We proposed, therefore, to amend Schedule 1 of the Schedule of Fees Rules by adding a new category of fees in *Section 5 – Fees Applicable to Frequency Licenses*.
- 33 A draft of the proposed new category of fees is attached as **Attachment 4**. We strongly recommend that you review that Attachment, and not simply rely on the description below, when submitting your comments.
- 34 These new annual and application fees would be identical to those which currently apply to the Cellular Mobile Service License.

RELEVANT MSS SPECTRUM BANDS

- 35 Except as noted in the next paragraph, we did not specify in our Consultation Paper the specific MSS frequency ranges that this frequency license category would apply to at this time, and we noted that we intended to conduct a separate consultation on that matter. At that time, we would also consult on whether MSS frequency ranges used for D2D services should be included in the spectrum aggregation limits in our 2025 Spectrum Aggregation Policy.²⁵
- 36 However, notwithstanding this, we noted in our Consultation Paper that other jurisdictions have designated the 2GHz band (2170-2200 MHz paired with 1980-2010 MHz in the FSM)²⁶ for D2D services and have licensed it on an exclusive basis. We were of the preliminary view that this band, when used for D2D services, has high economic value. In the FSM, this band has been licensed to Starlink, and we proposed that the D2D service frequency license category apply at a minimum to that MSS frequency range.

CONSULTATION PROCESS

- 37 On February 16, 2026, we published a Consultation Paper inviting public comment on the introduction of D2D mobile satellite services in the FSM. In that paper, we presented the changes to the Spectrum Licensing Rules and to the Schedule of Fees Rules that we proposed to make and which are outlined above. Included in the Consultation Paper were five consultation questions.
- 38 We received comments from five parties: AST & Science, LLC (**AST**), Globalstar, Inc. (**Globalstar**), iSolutions Micronesia Inc. (**iSolutions**), Skylo Technologies, Inc. (**Skylo**) and a party who requested confidentiality for their submission (**Intervenor**). Their submissions and our responses to their comments are summarized below.

Question 1

- 39 We asked whether parties agreed with our proposal to make spectrum licensing rules and license fee rules to support the introduction of D2D services in the FSM, and, if not, to explain why and explain why they believed the long-term interests of users would be better promoted by not making these rules.

Comments from parties

- 40 All four parties supported our proposal. iSolutions, however, favored a regulatory framework that allows D2D to complement rather than to displace domestic infrastructure. Skylo recommended that the proposed licensing framework be extended to apply to MSS services

²⁵ Available at <https://tra.fm/wp-content/uploads/2025/08/Final-Decision-on-Spectrum-Aggregation-Limits-Consultation-002.pdf>

²⁶ The range differs slightly from country to country.

also proposed that the 2GHz band be divided into three 2 x 10 MHz blocks, and that an operating license only be required if the spectrum licensee is selling directly to the public. Globalstar recommended removing the RFA requirement as applications should be permitted at any time. iSolutions urged us to consider mechanisms to encourage integration between satellite operators and local licensees. Skylo questioned why a spectrum licensee also requires an operating license and, consistent with their prior comments, recommended that the proposed spectrum license apply to MSS service in general and not just to D2D service specifically.

TRA responses

- 46 An Operating License issued under the Act authorizes a person to operate telecommunications networks and to provide telecommunications services in the FSM. This is separate from the Spectrum License, which authorizes a person to use spectrum in the FSM. We note that, whether a spectrum licensee is providing services on a retail basis directly to the public or on a wholesale basis to other licensees, the spectrum licensee is providing a communications service in the FSM and therefore requires an operating license pursuant to section 329 of the Act – unless the associated network and service is license-exempt. The proposed rules for the Direct-to-Device Mobile Satellite Service License did not make this clear. We will clarify this position by modifying section 4(a) to read: *“Persons applying for a Direct-to-Device Mobile Satellite Service License must hold or obtain an associated Operating License or be exempt from the requirement to hold an Operating License.”*
- 47 We consider that MSS spectrum used for D2D services is of high economic value.³⁰ In our view, this has been confirmed by the strong interest in this spectrum that has been conveyed through the comments of the parties in response to the Consultation Paper. Under the Spectrum Licensing Rules, an RFA process is therefore appropriate for licensing the relevant spectrum. We also note that the MSS-based D2D service is similar to the cellular mobile service, which is currently subject to an RFA licensing process. We consider it appropriate, therefore, that MSS-based D2D spectrum also be subject to an RFA licensing process.
- 48 With respect to Globalstar’s concern that applications for spectrum should be permitted at any time, we note that this is already the case: any person may apply for spectrum at any time subject to the terms of the Spectrum Licensing Rules. However, when spectrum is subject to the RFA licensing process, we must then publish an RFA before we can license it. The RFA process gives all market participants an opportunity to discover that valuable spectrum is available and allows us to discover the level of demand for the spectrum in question, which in turn determines whether we can license the spectrum to the applicant(s) after the RFA process or whether we need to proceed to a Competitive Tender.
- 49 We note that our proposed spectrum licensing rules do not preclude cooperation between satellite operators and local licensees. Specifically, the proposed rules support both the provision of D2D services directly to end-users (the retail model) and the provision of D2D

³⁰ MSS spectrum used for D2D services is relatively scarce and enables services that are similar to those provided using cellular mobile service spectrum. In particular, in the context of the FSM, a “coverage-oriented solution” delivering mobile communications services directly to cellular mobile handsets is indeed similar to cellular mobile services. Further, the TRA expects the technology using MSS D2D spectrum to evolve over the near to medium term to deliver services beyond narrowband services – if the operator has sufficient spectrum – which would reinforce its similarity to cellular mobile service spectrum.

services to end-users indirectly through a partnership with a terrestrial mobile operator (the wholesale model). Indeed, nothing in the proposed rules prevents a terrestrial mobile operator from applying for a D2D spectrum license. However, in order to ensure that the spectrum will in fact be used to provide services to consumers and businesses in the FSM, that terrestrial mobile operator would have to show they have a commercial arrangement with a satellite operator supporting the use of that spectrum. We consider therefore that the proposed licensing framework can be used as a mechanism to encourage cooperation between satellite operators and terrestrial mobile operators in the FSM.

- 50 We note AST’s proposal to divide the 2GHz band into three blocks. This proposal is moot given that the 2GHz band has already been licensed to one operator (Starlink) and we did not propose in the Consultation Paper to revoke that license. For clarity, this means that, if we adopt the proposed changes to the Spectrum Licensing Rules, they would apply to the 2GHz band on a going-forward basis, but we would not revoke the existing license or subject the spectrum to an RFA process. However, we will consider AST’s proposal with respect to other MSS frequency ranges that might be designated as D2D service bands.

Question 3

- 51 We asked whether parties agreed with the proposed annual and application license fees for the Direct-to-Device Mobile Satellite Service License set out in Attachment 3 of the Consultation Paper³¹ and, if not, to describe how they would propose to change the license fees and explain why.

Comments from parties

- 52 Most parties agreed with the proposed fees. AST noted that they did not support the use of auctions to determine fees, and recommended that renewal fees be cost-based. AST also suggested that MSS D2D spectrum should not be priced in the same way as IMT spectrum. iSolutions noted that aligning D2D fees with cellular mobile “*appears appropriate in maintaining competitive parity.*” Skylo, however, disagreed with the proposed fees, arguing that the fees should not be benchmarked against cellular mobile fees, that fees should not apply to MSS mobile earth stations, and that the fees were significantly higher than equivalent fees applied in other jurisdictions. Skylo recommended that we adopt “*a nominal administrative cost-recovery model rather than an IMT-benchmarked incentive price.*”

TRA responses

- 53 We note Skylo’s submission that MSS D2D serves as a complementary service rather than a direct competitor to mobile services. We agree that some of MSS D2D service’s greatest impacts will be in unserved or underserved areas in the FSM, and agree that MSS D2D has the potential to provide universal coverage. However, we consider that, in the context of the FSM, ‘universal coverage’ means that the services being provided using MSS D2D spectrum would likely also be offered in the same geographic areas as cellular mobile services, not just in remote areas or outer islands. We further consider that MSS-based D2D services are similar to and are likely to compete with cellular mobile services, as both include voice, text and data services delivered to an end-user’s mass market mobile handset. While MSS D2D may be primarily a complementary service to cellular mobile service at the present time, we expect this to change over the 15-year term of the spectrum license.

³¹ This is now Attachment 3 of this Draft Decision.

- 54 Our duties under the Act include providing technologically and competitively neutral regulation and providing conditions for effective competition among service providers. As noted above and in the Consultation Paper, we consider that the services provided to consumers and businesses using D2D Mobile Satellite Service spectrum and Cellular Mobile Service spectrum are similar. In order to provide competitively neutral regulation and to promote effective competition, service providers using one technology should not have an unfair advantage over service providers using a different technology to provide the same service simply because they pay different fees for the necessary spectrum.
- 55 Given that MSS D2D spectrum and cellular mobile spectrum would both be used to provide similar services, we consider it appropriate to apply the same fees to the spectrum used to provide MSS-based D2D services as we apply to the spectrum used to provide cellular mobile services. As iSolutions points out, this maintains competitive parity between cellular mobile and MSS-based D2D operators. The use of another model for spectrum license fees for MSS-based D2D spectrum would likely not achieve our objective of providing the conditions for effective competition in the FSM.
- 56 We note AST's comments with respect to renewal fees. We do not consider that this needs to be decided at this time. Further, we note that the proposed renewal fees are identical to those which apply to Cellular Mobile Service Licenses. We expect MSS D2D services to evolve over the 15-year term of the spectrum license beyond the coverage, emergency and IoT purposes described by AST. As a result, we consider that adopting the same renewal fee mechanism as for cellular mobile service spectrum is appropriate.
- 57 We also note AST's comments with respect to auctions. It would be premature to consider whether an auction is appropriate, as this would only be considered if we are required to proceed to a Competitive Tender under the Spectrum Licensing Rules.

Question 4

- 58 We asked parties whether they agreed that the Direct-to-Device Mobile Satellite Service License should apply to licenses issued for frequencies in the 2GHz band (2170-2200 MHz paired with 1980-2010 MHz) and, if not, to explain why.

Comments from parties

- 59 All parties who responded to this question agreed that the D2D MSS spectrum license should apply to licenses issued for frequencies in the 2GHz band. Globalstar recommended that the D2D MSS license should also apply to frequencies in the 1610-1621.35 MHz and 2483.5-2500 MHz bands. Skylo submitted that it was rare for one satellite network operator to be exclusively awarded the entire 2GHz band and recommended that multiple satellite network operators be authorized to use the 2GHz band through exclusive rights to use 2 x 5 MHz or 2 x 10 MHz in that band.

TRA Responses

- 60 Globalstar's recommendation to apply the D2D MSS spectrum license to another band will be addressed in the section on Question 5 below.
- 61 With respect to Skylo's recommendation, we consider it to be moot given that the 2GHz band has already been licensed to one operator (Starlink) and we did not propose in the Consultation Paper to revoke that license. For clarity, this means that, if we adopt the

proposed changes to the Spectrum Licensing Rules, they would apply to the 2GHz band on a going-forward basis, but we would not revoke the existing license or divided the band into blocks and subject them to an RFA process. However, we will consider Skylo’s recommendation with respect to other MSS frequency ranges that might be designated as D2D bands. We note that an option to address Skylo’s submissions regarding MSS D2D competition might be to establish spectrum aggregation limits on all MSS D2D spectrum bands pursuant to section 9 of the Spectrum Licensing Rules. Such limits could ensure MSS D2D spectrum, taken as a whole, would be assigned to more than one person, which would promote MSS D2D competition in the FSM. Any proposal to establish spectrum aggregation limits on MSS D2D spectrum would be the subject of a separate, follow-up consultation.

Question 5

62 We asked parties whether there were other frequency ranges or bands that they believed should be included under the Direct-to-Device Mobile Satellite Service License and, if so, to explain why and describe the potential impact on other users or potential users of those frequency ranges or bands.

Comments from parties

63 Three parties recommended other frequency ranges to which the D2D MSS License should apply. Globalstar recommended it should also apply to frequencies in the 1610-1621.35 MHz and 2483.5-2500 MHz bands. Skylo recommended that it apply to all of the L-band and S-band frequency ranges that have been included in 3GPP Release 17 and later (i.e. the n256, n255, n254, n253, n252, n251, and n250 NR bands). The Intervenor recommended that it apply to the [c-i-c.
 [REDACTED]
 [REDACTED]
 [REDACTED]]

TRA responses

64 We note that the seven bands recommended by Skylo overlap to a considerable degree and that some of them are mutually exclusive, that is, the use of one necessarily precludes the use of another. For example, if we were to introduce bands n255 and n253, bands n251 and n250 would not be available because of competing demand for the downlink portion of those bands.

5G Band	Downlink	Uplink
n256	2170-2200 MHz	1980-2010 MHz
n255	1525-1559 MHz	1626.5-1660.5 MHz
n254	2483.5-2500 MHz	1610-1626.5 MHz
n253	1518-1525 MHz	1668-1675 MHz
n252	2180-2200 MHz	2000-2020 MHz
n251	1518-1559 MHz	1626.5-1660.5 MHz
n250	1518-1559 MHz	1668-1675 MHz

- 65 We also note that the downlink portion of the n254 band (2483.5-2500 MHz) overlaps with LTE Band 41 (2496–2690 MHz).³² LTE Band 41 has already been allocated to terrestrial cellular mobile use and is included in our 2025 Spectrum Aggregation Policy for cellular mobile spectrum. If we were to introduce the n254 band for D2D use, we would first need to transfer the overlapping portion (i.e. 2496-2500 MHz) from terrestrial mobile use to D2D use or, alternatively, reduce the size of the band available for D2D use.
- 66 Having considered the submissions of the parties, we are of the preliminary view that that the D2D MSS License should apply to the n255, n254 and n253 bands in addition to the 2GHz band (a.k.a. band n256). However, we will consider this matter, and related matters such as the application of the 2025 Spectrum Aggregation Policy and the transfer of the 2496-2500 MHz block from LTE Band 41 to band n254, in a separate consultation.

DRAFT DECISION

- 67 In light of the comments received, we consider that the proposed changes to the Spectrum Licensing Rules or to the Schedule of Fees Rules do not need to be modified, except that section 4(a) of the proposed Direct-to-Device Mobile Satellite Service Frequency License in the Spectrum Licensing Rules will read: *“Persons applying for a Direct-to-Device Mobile Satellite Service License must hold or obtain an associated Operating License or be exempt from the requirement to hold an Operating License.”*
- 68 We propose, therefore, to adopt the proposed changes to the Spectrum Licensing Rules and to the Schedule of Fees Rules as described out in **Attachment 3** and **Attachment 4**, respectively, to this Draft Decision.
- 69 We further propose to apply the proposed changes to the Spectrum Licensing Rules and to the Schedule of Fees Rules to spectrum in the 2GHz band (2170-2200 MHz paired with 1980-2010 MHz) going forward, and to such other spectrum bands as we may designate as Direct-to-Device Mobile Satellite Service spectrum bands in the future.

NEXT STEPS

- 70 We will carefully consider all submissions received by the deadline specified in paragraph 6 above. Following this, we will publish our Final Decision, including our responses to the submissions and an explanation for any changes we might make to the proposed amendments to the Spectrum Licensing Rules and/or the Schedule of Fees Rules.

³² This is also 5G NR band n41. The issue with the overlap is the same.

Attachments

- 1 Attachment 1: Comments form
- 2 Attachment 2: Draft Determination
- 3 Attachment 3: Proposed Direct-to-Device Mobile Satellite Frequency License
- 4 Attachment 4: Proposed Direct-to-Device Mobile Satellite Frequency License Fees

Annex – List of defined terms

2GHz band	The 2170 – 2200 MHz (downlink) frequency range paired with the 1980 – 2010 MHz (uplink) frequency range
Act	The FSM Telecommunications Act of 2014
c-i-c	Commercial-in-confidence
Consultation Paper	A Consultation Paper on Direct-to-Device Mobile Satellite Spectrum, published by the TRA on February 16, 2026
D2D	Direct-to-Device
FCC	Federal Communications Commission of the United States of America
FSM	The Federated States of Micronesia
IMT	International Mobile Telecommunications
MSS	Mobile-Satellite Service
RFA	Request for Applications
TRA	The Telecommunication Regulation Authority

Attachment 1 - Comments Form



Feedback on Consultation Paper: Direct-to-Device Mobile Satellite Service

Information of commenting party

Full name	
Organization	
Phone number	
Email	
Is confidential information being submitted?	Y/N (Specify below)

Comments

	Comment	Proposed changes	Confidentiality ³³
<i>Paragraph Number or Section of Consultation Document, or Consultation Question, that Comment Pertains To</i>	<i>Please describe comments on specific section or question. Please be as detailed as possible and explain why you hold your views and what the potential impact of the Authority's proposed Rules changes would be</i>	<i>Please suggest an alternative to the proposed Rules changes (if applicable)</i>	<i>If confidential, please explain reasons for confidentiality request</i>
<i>(Insert rows as needed)</i>			

Please complete this form in full and submit to consultations@tra.fm or in person before June 22nd 2026 to:

Takuro Akinaga
 Chief Executive
 FSM Telecommunication Regulatory Authority
 KSP Building, 2nd Floor
 Main Street, Kolonia
 Pohnpei FM 96941, Federated States of Micronesia

³³ Confidentiality requests are managed under the rules set out in Section 322 of the Telecommunications Act. Respondents should clearly mark which information is claimed as being confidential and should provide reasons of what commercial harm will result should the information be published. Respondents who make a request for confidentiality should also provide a redacted copy of their submission, with all confidential information removed, that the TRA may publish.

Attachment 2 – Draft Determination

The Authority has made, and hereby publishes, the following [draft] determinations on amending the Spectrum Licensing Rules and the Schedule of Fees Rules, to add a new category of Direct-to-Device Mobile Satellite Service frequency license and associated license fees, respectively:

- 1 Schedule 1 of the Spectrum Licensing Rules shall be amended by inserting a new section, as set out in Attachment 3 of this [Draft] Decision, between the existing *Section 2 – Cellular Mobile Service License* and the existing *Section 3 – Fixed Service Licenses*, and by renumbering the sections accordingly.
- 2 The table at Section 5 of Schedule 1 of the Schedule of Fees Rules shall be amended by inserting a new category of license fees, as set out in Attachment 4 of this [Draft] Decision, between the existing category of license fees for *Cellular Mobile* and the existing category of license fees for *Fixed Link License (point-to-point)*.
- 3 The rules set out in Attachment 3 of this [Draft] Decision and the fees set out in Attachment 4 of this [Draft] Decision shall apply going forward to the 2GHz spectrum band (2170-2200 MHz paired with 1980-2010 MHz) and to any other bands that the Authority may designate as Direct-to-Device Mobile Satellite Service bands in the future.

Attachment 3 - Proposed Direct-to-Device Mobile Satellite Frequency License

Section 2A. Direct-to-Device Mobile Satellite Service License

- (1) The Authority may authorize Persons to transmit, receive, or transmit and receive Communications by means of Radio Apparatus for the purpose of providing Direct-to-Device Mobile Satellite Services to the public.
- (2) The Authority shall license Persons for public Direct-to-Device Mobile Satellite Services only according to the National Table of Frequency Allocations, taking into consideration the Radio spectrum frequencies identified for Mobile Satellite Service by the ITU.
- (3) The Authority shall assign Direct-to-Device Mobile Satellite Service Licenses following a request for applications published by the Authority in accordance with Section 17.
- (4) Conditions and requirements for Direct-to-Device Mobile Satellite Service Licenses:
 - (a) Persons applying for a Direct-to-Device Mobile Satellite Services License must hold or obtain an associated Operating License or be exempt from the requirement to hold an Operating License.
 - (b) Persons applying for a Direct-to-Device Mobile Satellite Services License must demonstrate that they are either a satellite network operator with, or have a commercial arrangement with a satellite network operator for, access to a satellite or satellite system that uses the relevant frequencies. The applicant shall demonstrate that the frequencies used by the satellite or satellite system have either been confirmed as brought into use, as defined in the ITU Radio Regulations, or submitted to the ITU in a notification and published 'as received', and that the applicable service area includes the FSM.
 - (c) a License granted under this section includes both the right to use approved frequencies and to operate the end user Radio Apparatus that uses those frequencies; it does not include the right to operate other types of earth stations, such as stations conducting TT&C functions for associated satellite networks and systems; gateway and feeder link stations for FSS, BSS and MSS; landing stations used to backhaul telecommunications services within a community hub model, where local distribution is done by terrestrial services; or end user terminals that do not use the approved frequencies.
 - (d) a License granted under this Section authorizes the Licensee to deploy an unlimited number of end user terminals; no individual authorization of such Radio Apparatus is required.
 - (e) Communications Network and end user Radio Apparatus does not require approval by the Authority prior to the commencement of operations provided it is compliant with the provision of Section 32 of these Rules.

- (f) Coverage obligations may be imposed by the Authority in accordance with Section 38.
 - (g) The Authority shall assign Licenses under this section for use of the radio frequency spectrum block or band in the entire territory of the FSM.
 - (h) Radio Apparatus used as part of providing the authorized service shall comply with any technical standards or requirements in accordance with Section 32.
 - (i) Other technical conditions (e.g., power limits for Radio Apparatus and end user devices) may be specified from time to time in order to minimize interference.
 - (j) The Authority may establish additional conditions and requirements in the Direct-to-Device Mobile Satellite Service License.
- (5) Holders of a Direct-to-Device Mobile Satellite Service License shall:
- (a) only use the radio frequencies or radio frequency bands approved by the Authority;
 - (b) register the satellite(s) used by the Direct-to-Device Mobile Satellite Service with the Authority, but no prior approval for building or operating such satellite(s) is required from the Authority provided they are licensed by the relevant foreign administration;
 - (c) keep adequate records to allow any instances of interference to be resolved.
- (6) The initial term of Direct-to-Device Mobile Satellite Service Licenses shall be fifteen (15) years, with renewals allowed under Section 24.

Attachment 4 - Proposed Direct-to-Device Mobile Satellite Frequency License Fees

License Type	Description	Application Fee	Annual Fee	Renewal Fee
Direct-to-Device Mobile Satellite	Frequencies below 1 GHz (per 2x5 MHz)	85 or as determined in the tender documents	15,980	As determined by the Authority at the time of renewal
	Frequencies above 1 GHz (per 2x5 MHz)	85 or as determined in the tender documents	6,390	As determined by the Authority at the time of renewal