

Space Policy
Conference

ASPC-26

Direct-to-Device (D2D)

- *From Pilot to Policy*

July 23, 2026

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AGENDA OVERVIEW

NTN Ecosystem

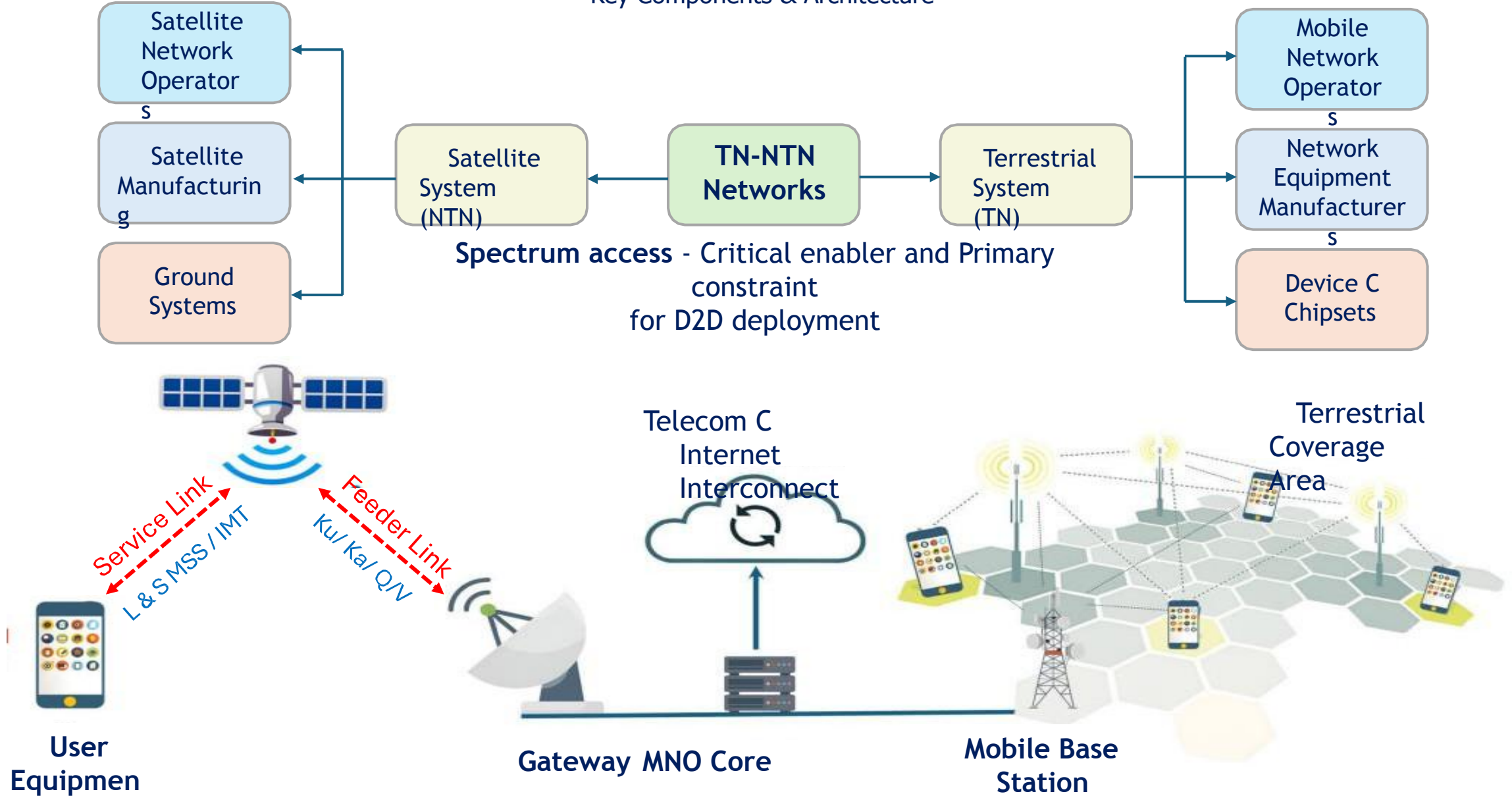
Key component | Architecture |
Spectrum

D2D Technical s Regulatory Building Blocks

International Regulation | Spectrum coordination |
Interference management

NTN Ecosystem

Key Components & Architecture



Successful D2D requires simultaneous evolution of Space Segment, Mobile Network, Integration s spectrum framework

Satellite D2D - Spectrum Strategies

Different way of connecting a smartphone

MSS - Based D2D (Standard Based C OEM-led Proprietary)		IMT Spectrum -Based D2D (Operator specific)	
1	Dedicated Spectrum for Satellite services	1	Spectrum access through agreement with licensed
2	Existing ITU regulatory framework	2	MNOs Larger addressable market with unmodified smartphones in use.
3	Well-established frequency coordination mechanism internationally.	3	Potential to support higher capacity services through wider IMT spectrum.
4	Requires NTN capable modem/ chipset support by phone manufacturers- Device ecosystem is emerging.	4	Spectrum sharing, cross-border coordination C interference management remain key regulatory priority.
User Link Spectrum: L (n255) C S (n256)		User Link Spectrum: below 2.7 GHz	

KEY Findings

- ✓ MSS based D2D – a strong foundation for early deployment for Narrow-Band use cases. But framework needed about responsibility of ownership – **end user, security & traceability.**
- ✓ D2D-IMT **next evolutionary phase** but requires coordinated spectrum policy & coexistence frameworks at both national & international level.

Satellite D2D - Connectivity

Technology Evolution & Key Enablers

The Real Breakthrough

The breakthrough is not the satellite itself — satellites have existed for decades. It is enabling a standard mobile device to become satellite-connected.



The True Foundation

The real foundation of a scalable D2D ecosystem is **spectrum access, coexistence, and commercial sustainability** — not just constellation size.

User link Spectrum Sharing &

IMT Spectrum - Not Yet a settled matter.

MSS Spectrum — Co-coverage & Co-frequency sharing challenges. spectrum becomes the **limited resource**.

Feeder link Spectrum

Gateway Spectrum & licensing: Larger spectrum for Feeder link create more challenge on sharing spectrum at gateway locations.

Multi-Constellation

FSS spectrum shared among multiple NGSO Constellation.

Potential for constellation congestion when **xx NGSO systems** operate in same band.

D2D service may require regulatory clarity on all of these key enablers. **Missing one of these may have impact on deployment AT SCALE.**

Satellite D2D - User Spectrum Coexistence

I M T S P E C T R U M M S S P E C T R	IMT Spectrum	
	Risk Area	Options for risk mitigation
	1. Co-frequency sharing with terrestrial mobile. 2. Adjacent-channel & Out-of-Band emission. 3. Cross Border Interference. 4. Protection to co-primary services.	✓ Evolving Framework: Still evolving internationally ITU-R Studies underway. ✓ The Core Question: Can large-scale satellite operation in IMT bands coexist with existing networks without causing harmful interference?
	Key Watch Point - The WRC-2027 will be a critical milestone. Decisions on sharing studies & coexistence would shape the D2D commercial success.	
	Risk Area	Options for risk mitigation
	1. Limited spectrum in L & S band. 2. Co-frequency sharing between constellation is fundamentally challenging.	✓ Preserve access to MSS spectrum: Portion of capacity reserve for National resilience, public safety & future constellations. ✓ Reviewing the future use of MSS spectrum: Forward looking policy to support sovereign satellite capability for national infrastructure.
	Key Watch Point - Countries are moving beyond traditional Spectrum Assignment, e.g: EU's proposal on 2 GHz ACMA licensing framework for 2 GHz Japan's J-LEO concept China's support for national constellation.	

Feeder link - The Hidden Capacity Enabler

From a system engineering perspective - A scalability challenge

- Unlike user spectrum, Gateway carry “aggregated traffic”, requires access to very large BW – **in fact entire available spectrum**
- Gateway locations with high-capacity, high reliable fiber connectivity – **critical for PoP interconnection**
- Prefer proximity to Internet exchange points and hyperscale data centres - **to optimize latency**

This leads to the Geographical clustering of Gateway stations.

The technical challenges -

- **Interference potential** - as operator requires access to the majority of the **SAME feeder-link spectrum (Ku / Ka / Q&V)**.
 - ✓ **Operators may need** – additional separation distance or frequency segmentation.
- **Create barrier for future entrants-** The first few gateways deployed at a strategically valuable (fiber-rich) locations
 - ✓ **New Operators may encounter** – Reduced spectrum availability | stricter coordination conditions | relocation to less optimal sites | longer fiber backhaul routes | Higher latency

Gateway access should be coordinated using both geographic and spectrum planning – **to preserve constraint free locations for future NGSO systems for Broadband & D2D**

Multi-Constellation Coordination

Global satellite landscape is changing - Need - Building Scalable coordination frameworks

- **Earlier** – Few GSO and limited NGSO systems - **Primely for DTH & VSAT based broadband services**
- **Future** – Multiple mega-constellation with 1000s of satellite – **Home Broadband (FWA) + Mobility (D2D)**

Multi-constellation ITU coordination is feasible – but not infinitely scalable.

The technical challenges -

- Limited amount of spectrum | Ku & Ka band most congested and shared among existing operators | No inter-constellation coordination framework beyond ITU First-Come-First-Served (FCFS) notification - **Potential for constellation congestion when xx NGSO systems operate in same band.**
- No theoretical limit in ITU-RR, however there is a practical engineering limit.
 - ✓ Suppose – N constellations, then required bilateral coordination needed is $N(N-1)/2$
 - ✓ So, 5 Constellation -> 10 coordination **(it may still work)** BUT 10 Constellation -> 45 coordination **(Very Challenging)**
- Whether the existing ITU coordination framework is sufficient to ensure multiple constellation can coexist.
 - ✓ Frequency coordination complexity grows rapidly than number of constellation – **This is a scalability challenge.**

The Next-gen of spectrum policy should not merely determine who gets access to spectrum—it should determine if the existing framework is sufficient to scale multiple systems to coexist efficiently.

Key Takeaways

D2D - Natural NTN evolution

D2D-MSS provides the earliest pathway| D2D-IMT offers opportunity for mass-market connectivity but requires spectrum sharing & coexistence mechanism -[WRC-27 Agenda Item 1.13](#) is critical.

Roadmap for D2D services

Spectrum management to promote future constellations | Remain Open to both MSS & IMT based D2D|
Advances
in 3GPP standards & handset capabilities for service improvement

Long Term scalability

Plan for Scale: Accelerating NTN chipset through 3GPP to widen the MSS based device ecosystem

Spectrum sovereignty preservation

Suitable framework for national control over spectrum resources to ensure TRUE sovereignty & security and establish mechanism to increase in constellation scale.