

27 January 2025

Independent Communications Authority of South Africa (ICASA)
350 Witch-Hazel Avenue, Eco Point Office Park
Eco Point, Centurion

Subject: Responses by Globalstar, Inc. to the Inquiry into New Individual Electronic Communications Network Service Licenses in South Africa

Dears,

Globalstar, Inc. hereby submits the attached comments in response to the inquiry into new individual electronic communications network service licenses in South Africa as per Government Gazette No. 53719 of 25 November 2025.

Globalstar would like to thank ICASA for its invitation to industry stakeholders and interested parties to provide comments and thoughts on the current rules as it works to evolve its national licensing framework. As a long-time licensee in South Africa, Globalstar is markedly impressed by the continuous efforts and improvements that ICASA implements to the benefit of competition and consumer choice in the telecommunications market.

Our team remains available for any additional questions or clarifications on the content of this submission, and we look forward to the following phases of the inquiry process.

Sincerely,



Levin M Born
Senior Director, Global Licensing and Regulatory Affairs

Contact Details for Respondent

Organization	Globalstar, Inc and Globalstar Satellite Services (PTY) Ltd
Name and Surname	Levin M Born
Position	Senior Director, Global Licensing and Regulatory Affairs
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Background and Overview

Globalstar is a leading provider of global Mobile Satellite Services (“MSS”). Operating continuously in the S-Band and L-Band for more than two decades, our low-Earth orbit (“LEO”) non-Geostationary orbit (“NGSO”) system supports the delivery of reliable MSS to consumers, public safety personnel, and enterprise customers globally. Globalstar’s constellation of satellites and its network of ground stations on six continents provide affordable, high-quality MSS to more than 780,000 of its own end-user customers around the world. Since 2022, Globalstar’s MSS network has been providing direct-to-handset connectivity currently available in supported regions on iPhone 14 and newer as well as Apple Watch Ultra 3.

In South Africa, Globalstar has held an I-ECS license and an I-ECNS license since 2007, and today provides important MSS to individuals and business alike through a network of value-added resellers. We greatly value our commercial and operational relationships in South Africa, and have always appreciated the regulatory clarity and structural transparency that has enabled us to exist and operate in full compliance with the Electronic Communications Act, as modified.

As we look ahead, we very much hope to see our services in South Africa continue to grow. Maintaining licensing stability and clear protections for existing licensees remains paramount, as it allows companies such as Globalstar to continue to invest in new technologies and services.

Section 1: Transfer of Individual I-ECNS and I-ECS Licenses Framework

- 1.1. What are your views on the current licensing framework in relation to the sale and transfer of I-ECNS and I-ECS licenses (section 13 of the ECA)? In particular, does the current licensing framework hinder or promote competition? In providing your response, please provide reasons supported by evidence or case studies, where applicable.

Globalstar considers the existing framework for the sale and transfer of I-ECS and I-ECNS licenses to be clear, comprehensive, and accessible. In particular, the requirements and transfer processes and costs are published, understood, and made available to all to grasp.

- 1.2. In your view, should the Authority intervene in the current sale and transfer market to facilitate the purchase of existing licenses? If yes, to what extent should the Authority intervene? Please motivate your response by providing reasons and any supporting evidence or data.

Globalstar does not have an opinion on this specific issue.

- 1.3. What other considerations or interventions would be useful for the Authority to consider regarding the effectiveness and efficiency of the current sale and transfer licensing framework so as to promote competition?

Globalstar does not have an opinion on this specific issue.

Section 2: The Demand for New Individual ECNS Licenses

- 2.1. In your view, are there sufficient market opportunities to justify issuing new IECNS and I-ECS licences? Please motivate your response.

Globalstar does not have an opinion on this specific issue.

- 2.2. Have you, or are you aware of any licensee or interested party who has, considered or is considering launching or expanding network infrastructure or providing services in South Africa? What technologies, network architecture and/or spectrum frequencies do you think would be appropriate for any new I-ECNS licensees? Please provide examples or evidence where possible.

Globalstar does not have a response to this question.

- 2.3. If you are an existing licensee, did you acquire your I-ECNS and or I-ECS licenses through the sale and transfer market (i.e. bought from another licensee) or did you obtain them directly from the Authority (not through transfer or change of ownership)? If acquired from the secondary market, please provide details on your experience.

Globalstar applied for and was awarded its pair of licenses directly from the Authority in 2007. Additionally, Globalstar did apply for and was approved for change of ownership, but not change of control, to bring its licensed entity into compliance with ownership rules in South Africa. The process to do so with ICASA was smooth, transparent, and clear, and the published timelines were generally adhered to.

- 2.4. If you have/had I-ECNS and/or I-ECS licenses, have you been approached or have you received unsolicited or solicited interest from an interested buyer to acquire your license? Please elaborate and provide as much information as possible, if applicable.

No, Globalstar has not been approached with expressions of interest in acquiring its licenses from a third party.

- 2.5. If you have I-ECNS and/or I-ECS licenses and are not intending to sell your license(s) in the next 3 - 5 years, please describe the infrastructure used (mobile, fixed, satellite or combination). Provide a list of services that you currently provide and whether those are provided to private consumers and/or businesses/organizations (or both where appropriate)?

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continents provide affordable, high-quality MSS to more than 780,000 of its own end-user customers around the world. Since 2022, Globalstar's MSS network has been providing direct-to-handset connectivity currently available in supported regions on iPhone 14 and newer as well as Apple Watch Ultra 3.

- 2.6. Are there any additional points that you think would be useful for the Authority to consider regarding the demand for I-ECNS and I-ECS licenses?

No, Globalstar has no additional points to make in this section.

Section 3. Whether new I-ECNS Licenses will Promote Competition in the Market for I-ECNS.

- 3.1. In your view, do you believe that new I-ECNS licenses will promote or improve competition in the market? Please substantiate your answer.

Globalstar does not have an opinion on this question.

- 3.2. If you answered yes to Question 3.1 above, are there any competition issues or concerns that may hinder the effectiveness of such new I-ECNS licenses in promoting or improve competition? Please provide evidence or examples.

Globalstar has no additional comments on this topic.

- 3.3. What regulatory measures, if any, should the Authority consider to remedy the competition concerns you have identified in Question 3.2 above, or to ensure that any new IECNS licenses compete effectively with the incumbents? Provide examples of the kinds of remedies you would expect to see.

Globalstar has no additional comments on this topic.

Section 4. Potential Contribution of new I-ECNS Licenses to Universal Access and Service.

- 4.1. In your view, will new I-ECNS and I-ECS licenses contribute to universal access and service within the current electronic communications network and services market? Please explain the mechanisms through which such contribution may occur. Provide any supporting data, case studies, or examples.

Globalstar does not have a view on this topic.

- 4.2. In your view, how should the Authority incorporate universal access and service obligations into the terms and conditions of new I-ECNS and I-ECS licenses to ensure equitable access to communications services across South Africa?

Globalstar does not have a view on this topic.

Section 5. Benefits of new I-ECNS Licenses Versus Costs, Including the Costs to the Authority of Monitoring and Enforcing Compliance with any Such Licenses, and the Burden on the Environment.

- 5.1. Are there any potential negative consequences associated with the rollout of infrastructure by the new I-ECNS licensees that the Authority should consider?

Globalstar does not have a view on this topic.

- 5.2. What new or additional benefits, if any, could new I-ECNS licenses provide compared to existing licensees? Please provide examples or evidence of potential improvements such as service coverage, infrastructure rollout, technological innovation, competition, or other market and social benefits.

Globalstar does not have a response to this question.

Section 6. Any Other Comments

- 6.1. Do you have any additional comments regarding this Inquiry process that you would like the Authority to consider?

Globalstar does not have any additional comments regarding the Inquiry process.