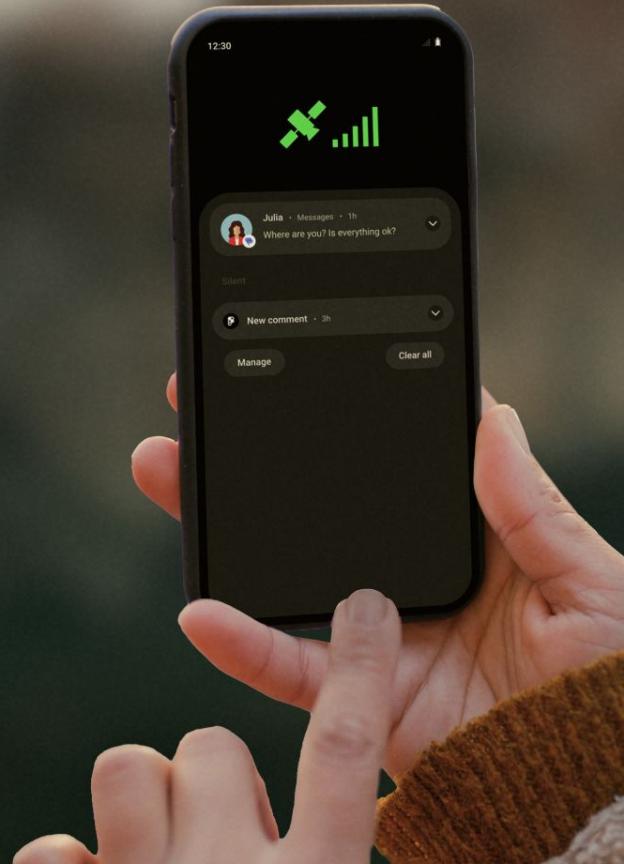




Never lose coverage.

ICASA Consultation on the Second Draft National Radio Frequency Plan 2025

15 January 2026



GETTING TO KNOW SKYLO

Skylo's Non-Terrestrial Network (NTN) service is 'direct-to-device'



Access existing GEO satellite networks for 2-way text messages and SMS, location sharing, app data, and SOS



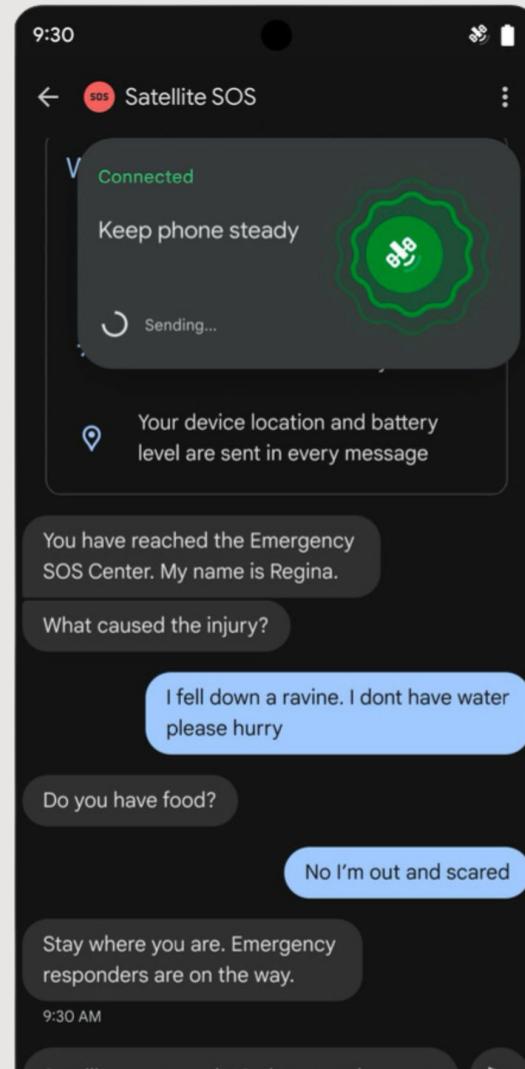
Seamless switching between cellular and satellite; **no IMT spectrum needed** because using MSS L- and S-bands



Connect with existing, compatible devices; **no extra hardware needed**



Frictionless way to add dual-mode connectivity to any cellular device
12.5 millions device activations



Proven execution track record as a global service operator



Global D2D service operator; > 12.5 million activations on our system



Service live and licensed in 37 countries and counting



13 modems, 10 modules, 25 devices under certification



First MSS solution natively integrated within Android 15



Orchestrating traffic over 7 MSS GEO satellites, across 4 SSPs



Core and service integrated with over 12 MNOs/MVNOs



World's **only** standards-based D2D certification program



Skylo RAN installed in 10 SSP Earth Station sites in 7 countries

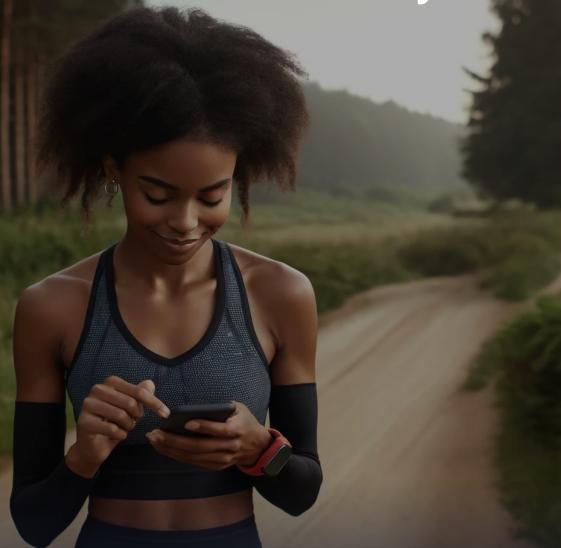


Trusted by Tier-1s in consumer, automotive, and enterprise segments

Two Types of 'Direct-to-device' NTN services

		skylo	
		D2D using MSS spectrum	D2D using terrestrial spectrum
Status	✓ Commercial today in 37 countries	Uncertainty regarding regulatory approvals	
Spectrum	✓ Globally Allocated MSS Bands	No allocation for MSS -- share terrestrial spectrum on non-interference basis	
Standardization	✓ 3GPP NTN, standard interfaces	Unmodified LTE	
System Alignment	✓ Chipset, Module, Device, OS	N/A	
Differentiation	✓ Standards+ Features	N/A	
Carriers	✓ Compatible across all, complementary	Tied to specific carriers	

We see 3 key markets with huge potential for D2D connectivity



Smartphone

Satellite messaging and SOS on consumer smartphones and wearables

Automotive

Track and monitor automotive health remotely + EV stations, routing, door unlock

IoT

Enables deeper industrial connections - even in remote areas

Global Ecosystem in place

Service & Device Partners



Module Partners



Chipset Partners



Industry Partners

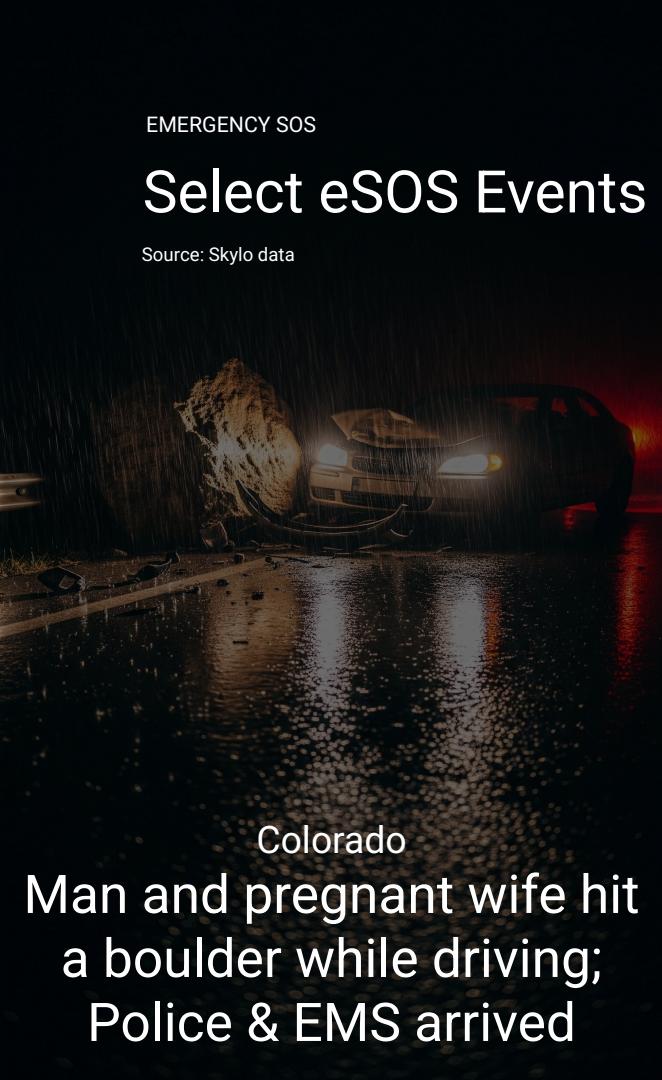


Skylo has **certified** 80% of the world's most popular chipsets, enabling >1B devices/year

EMERGENCY SOS

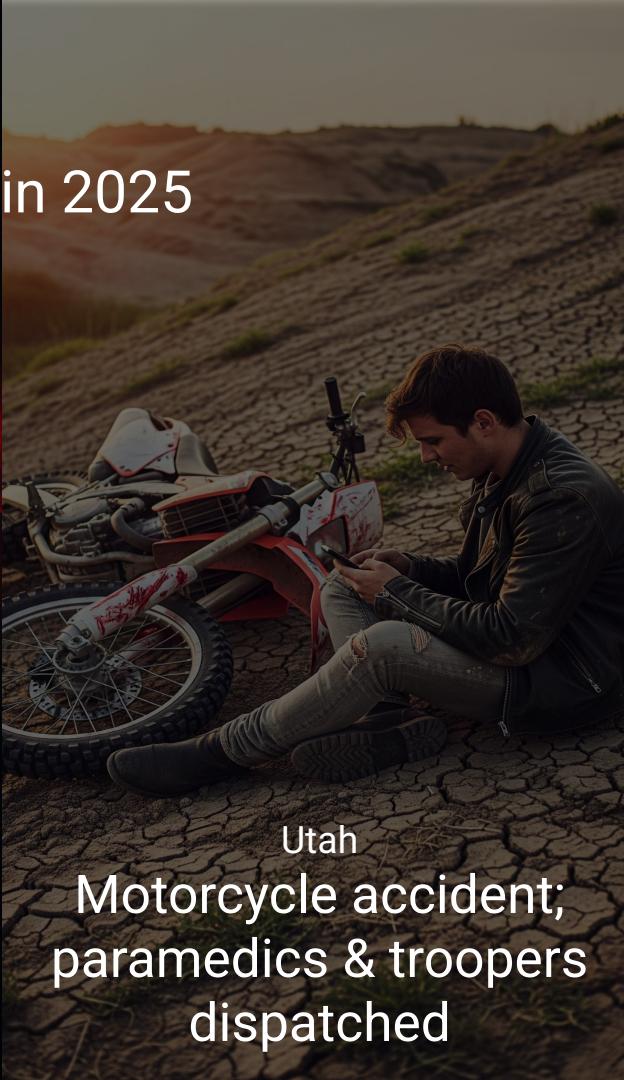
Select eSOS Events in 2025

Source: Skyo data



Colorado

Man and pregnant wife hit
a boulder while driving;
Police & EMS arrived



Utah

Motorcycle accident;
paramedics & troopers
dispatched



Arizona

Person with heart
condition collapsed
while hiking; EMS arrived

Summary of Skylo's response (1)

The most common L- and S-bands used by MSS operators globally have been explicitly included in 3GPP Release 17 and later releases for NTN.

3GPP NTN satellite bands to prioritize for NTN-D2D

NTN satellite operating band1	Uplink (UL) operating band Satellite Access Node receive / UE transmit FUL,low – FUL,high	Downlink (DL) operating band Satellite Access Node transmit / UE receive FDL,low – FDL,high	Duplex mode
n256	1980 MHz – 2010 MHz	2170 MHz – 2200 MHz	FDD
n255	1626.5 MHz – 1660.5 MHz	1525 MHz – 1559 MHz	FDD
n254	1610 – 1626.5 MHz	2483.5 – 2500 MHz	FDD
n253	1668 MHz – 1675 MHz	1518 MHz – 1525 MHz	FDD
n252	2000 – 2020 MHz	2180 – 2200 MHz	FDD
n251	1626.5 MHz – 1660.5 MHz	1518 MHz – 1559 MHz	FDD
n250	1668 MHz – 1675 MHz	1518 MHz – 1559 MHz	FDD
NOTE: NTN satellite bands are numbered in descending order from n256.			

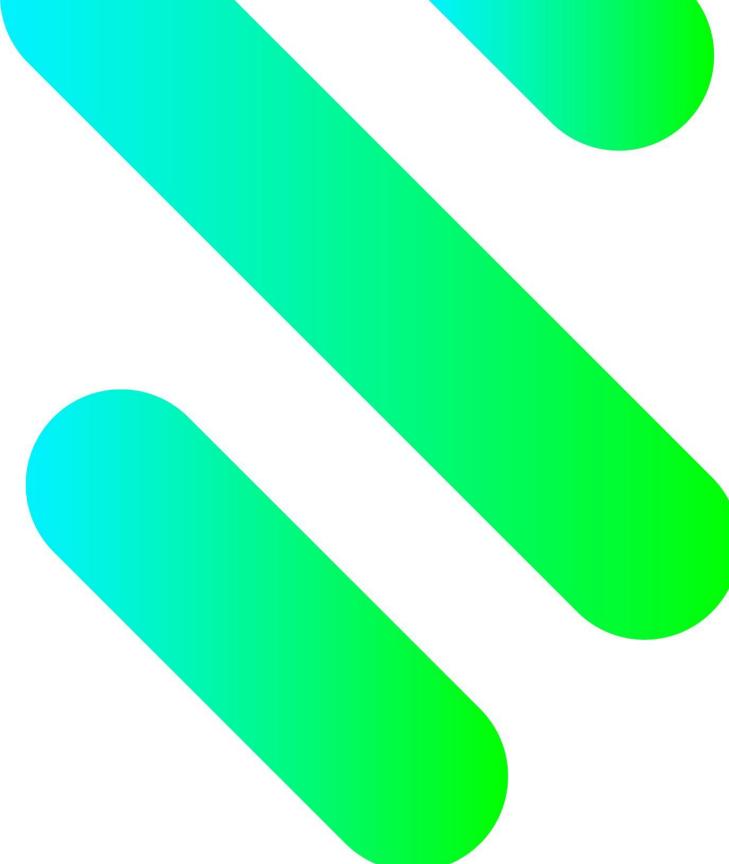
See: 3GPP 38.101-5, NR; User Equipment (UE) radio transmission and reception; Part 5: Satellite access Radio Frequency (RF) and performance requirements, https://www.3gpp.org/ftp/Specs/archive/38_series/38.101-5/

Summary of Skylo's response (2)

Skylo commends ICASA for including the majority of the above MSS L- and S-band frequencies in its draft National Radio Frequency Plan 2025 (NRFP) as identified for the satellite component of IMT, citing Resolution 225. Skylo observes that in the draft NRFP, **the 1980-2010 MHz (uplink) paired with 2170-2200 MHz band (downlink) or the band n256** is listed as being monitored for 'the development of satellites for IMT services,' with reference to Europe and Saudi Arabia, and that a Radio Frequency Spectrum Assignment Plan (RFSAP) will be developed for this band.

Skylo recommends that for consistency with the other MSS bands already identified for the satellite component of IMT, ITU Resolution 225 also be added in the notes and comments section as applying to the 1980–2010 MHz paired with the 2170–2200 MHz band.

Typical applications for **the band 1626.5-1660.5 (uplink) paired with 1525-1559 (downlink) or the band n255** should not be limited to Mobile satellite (1544 – 1545 MHz). To ensure alignment with other MSS bands, Skylo recommends revising the typical applications for these frequency bands to MSS (1626.5-1660.5 MHz) and MSS (1525-1559 MHz) respectively.



Mindel De La Torre
Head of Global Regulatory Affairs
mindel@skylo.tech

Molly Gavin
Vice President of Government
Affairs & Compliance
molly@skylo.tech

Natcha Techachainiran
Director of Regulatory Affairs
natcha@skylo.tech

Email: regulatory@skylo.tech

Online: skylo.tech

United States
2301 Leghorn St.
Mountain View,
California 94043

India
Whitefield, Survey No. 192,
Suite 132 Whitefield Main,
Road, B Narayanapura,
Mahadevapura, Bangalore, KA
560016

Finland
Metsänpojankuja 1,
Espoo,
02130

