Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	GN Docket No. 26-78
Office of Economics and Analytics Seeks Comment on the State of Competition in the Communications Marketplace	)	

COMMENTS OF AST & SCIENCE, LLC

AST & Science, LLC ("AST SpaceMobile"), a U.S. satellite manufacturer and operator, submits these comments in the above-captioned proceeding to assist the Commission's assessment of the state of competition in the communications marketplace, particularly for satellite communications, mobile wireless, and cross-platform services.[1] As the Commission observes in its *Public Notice,* non-geostationary orbit satellites "are capable of providing broadband services to industry, enterprise, and individual customers with lower latency and faster speeds than were previously available via [geostationary orbit] satellite."[2] AST SpaceMobile is at the forefront of delivering high-speed[3] cellular broadband connectivity to Americans and users around the world via the everyday handsets already in their pockets. Working with over 50 domestic and international mobile network operator ("MNO") partners,

[1] *See Office of Economics and Analytics Seeks Comment on the State of Competition in the Communications Marketplace*, Public Notice, DA 26-333, ¶¶ 7-12, 14-15 (rel. Apr. 6, 2026) ("*Public Notice*").
[2] *See id*. ¶ 10.
[3] AST SpaceMobile's satellites are designed to support full 4G and 5G broadband speeds, including voice, data, and video services. Peak data speeds are expected to greatly exceed 120 Mbps. AST SpaceMobile, *AST SpaceMobile Provides Business Update and Fourth Quarter and Full Year 2025 Results*, Press Release (Mar. 2, 2026), https://feeds.issuerdirect.com/news-release.html?newsid=8745562190863320&symbol=ASTS.

AST SpaceMobile is beginning to use International Mobile Telecommunications ("IMT") and Mobile Satellite Service ("MSS") to provide broadband direct-to-device ("D2D") connectivity.

By leveraging an assortment of IMT, MSS, and other spectrum, AST SpaceMobile is well-positioned to extend mobile broadband coverage to rural, remote, and underserved areas where traditional infrastructure has proven challenging or cost prohibitive. This flexible, hybrid approach also will enhance network resilience and scalability, enabling more seamless connectivity for consumers, enterprises, and public safety users across a broader geographic footprint. Additionally, AST SpaceMobile's collaborative partnerships with leading U.S. and international MNOs underscore its commitment to interoperability and seamless integration with existing networks. Unlike other operators, AST SpaceMobile is partnering with MNOs, not competing with them, to leverage the FCC's SCS framework (and similar frameworks worldwide) to provide seamless connectivity to users, who remain MNO (not AST SpaceMobile) customers.

The Commission's full grant of authority for a 248-satellite low-Earth orbit system[4] brings AST SpaceMobile ever closer to commencing commercial operations. To date, AST SpaceMobile successfully has launched six in-orbit satellites,[5] has an upcoming launch in June, and expects to launch approximately 45 satellites by the end of this year. AST SpaceMobile further expects to achieve continuous service in all targeted geographical markets with the launch and operation of a total of approximately 90 satellites. AST SpaceMobile manufactures

[4] *In re AST & Science, LLC,* Application to Add Supplemental Coverage from Space Authority, SAT-MOD-20250612-00145 et al., Authorization and Order, DA 26-391 (rel. Apr. 21, 2026).

[5] A seventh satellite launched on April 19, 2026, but was placed into a lower-than-planned orbit by the launch vehicle's upper stage. Although the satellite separated from the launch vehicle and powered on, the orbital altitude was too low to sustain operations with its on-board thruster technology. Consequently, the satellite was deorbited on April 20 in accordance with AST SpaceMobile's Commission-approved disposal plan.

its own satellites and is approximately 95% vertically integrated with its primary manufacturing hub in Texas. With over 500,000 square feet and over 2000 employees globally, AST SpaceMobile keeps all major manufacturing processes under U.S. control.[6]

AST SpaceMobile welcomes and supports the Commission's efforts to ensure the regulatory landscape keeps up with the pace of innovation. The Commission's *Space Modernization* rulemaking proceeding[7] represents an important step toward establishing a modern, flexible regulatory framework capable of supporting the next generation of space-based connectivity services. By continuing to advance regulatory frameworks that promote spectrum efficiency, operational flexibility, and timely access to market, the Commission will foster even greater competition in the satellite marketplace. Streamlined regulatory processes and reduced barriers to entry will encourage investment, accelerate innovation, and enhance the continued growth of the satellite industry.

AST SpaceMobile further supports additional proceedings such as the Commission's inquiry on satellite market access reciprocity.[8] Because satellites are international by their nature, satellite operators must navigate not only the competitive landscape within the United States, but also a complex array of foreign regulatory regimes, market-access requirements, spectrum coordination obligations, and licensing frameworks that may create barriers to entry and operational hurdles abroad. In seeking market access to provide service in foreign markets, AST SpaceMobile and other U.S. satellite operators face a growing number of obstacles,

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[6] AST SpaceMobile, *FCC Grants AST SpaceMobile Commercial Authority to Deliver Direct-to-Device Cellular Broadband from Space Advancing Nationwide, Resilient Cellular Broadband Connectivity in the United States*, Press Release (Apr. 22, 2026), https://feeds.issuerdirect.com/news-release.html?newsid=7611386394589592&symbol=ASTS.

[7] *In re Space Modernization for the 21st Century*, Notice of Proposed Rulemaking, SB Dkt. No. 25-306 (rel. Oct. 29, 2025).

[8] *Space Bureau and Office of International Affairs Seek Comment on Satellite Market Access Reciprocity*, Public Notice, GN Dkt. No. 26-28 (rel. Mar. 2, 2026).

including limits on foreign investment and subjective licensing criteria that can be weaponized to create barriers to entry.[9] A supportive and nimble regulatory environment at home allows U.S.-licensed operators like AST SpaceMobile to better confront these challenges.

AST SpaceMobile values the opportunity to comment in this proceeding, and the Commission's continued engagement with industry stakeholders and forward-looking approach to fostering growth and innovation in the satellite industry while advancing the public interest. AST SpaceMobile looks forward to continuing to assist the Commission's communications marketplace competition assessment and ongoing efforts to facilitate additional competition and advance American interests in space.

Respectfully Submitted,

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[9] *See* Comments of AST & Science, LLC, GN Dkt. No. 26-28 (filed Apr. 1, 2026).