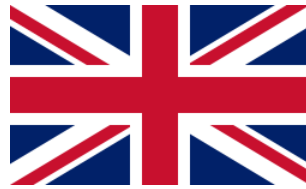


International Policy Considerations: FSS infrastructure



Draft EU Space Act (2025)

Aims to remedy some of the significant issues posed by large-scale NGSO systems

Market risks related to large-scale NGSOs with specific attention to systems larger than 1,000 satellites

Large-scale NGSO constellations are increasingly becoming systems that augment the risk profile of space operations. Imposes obligations on large-scale NGSO systems

Recommendation: India's spectrum/ space policy and roadmap should take into account the EU work. Ensure India's own NGSO options.

UK Parliamentary Report (2025) "Act Now or Lose Out"

Highlights the growing "spectrum grabbing" issues posed by large-scale NGSO systems

"...the current policy approach was created before the world took a very different turn geopolitically" and "before we had the rise of mega constellations and very strong players monopolising various parts of the global space industry..."

Recommendation: India's spectrum policy would benefit from incorporating analysis in the UK report. Specific attention on ensuring reliable access to NGSO spectrum.

Finalisation of interference evaluation mechanisms of Large NGSOs

ITU must finalise its work updating the EPFD evaluation software to accurately assess the interference profile of large-scale NGSOs (update Rec. S.1503). This is urgent.

WRC-27 agenda items for FSS (1.1 -1.4) must first resolve the unresolved coexistence issues posed by large-scale NGSOs

These agenda items ALL are affected by underestimation of large NGSO interference

Degradation of EPFD limits of Article 22 should not be allowed. It adds further uncertainty.

Recommendation: India's WRC-27 position on FSS agenda items should strive for certainty and clarity on the unresolved NGSO issues. NGSOs to be conditioned if allowed in new allocations.