

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

In the Matter of	)	
	)	
WorldVu Satellites Limited	)	ICFS File No. SAT-PDR-_____
	)	
Petition for Declaratory Ruling for Access to	)	Call Sign _____
the U.S. Market Access for the Eutelsat Next	)	
NGSO System	)	
	)	

PETITION FOR DECLARATORY RULING

Pursuant to Sections 25.137 and 25.157 of the Federal Communication Commission’s (“Commission’s”) rules¹ and the processing round opened by the Commission’s Space Bureau on June 5, 2026 (the “Third Ku/Ka Processing Round”),² WorldVu Satellites Limited (“Eutelsat”) hereby submits this petition for declaratory ruling (“Petition”)³ seeking access to the U.S. market for its next generation non-geostationary satellite orbit (“NGSO”), fixed-satellite service (“FSS”) constellation (“Eutelsat Next”).

I. INTRODUCTION

Over the past decade satellite broadband connectivity has rapidly grown from a niche service into an essential, daily connectivity solution for millions of people around the world. The Commission has been at the forefront of enabling this revolution and has demonstrated

¹ 47 C.F.R. §§ 25.137, 25.157.

² *Space Bureau Opens Processing Rounds; Cut-Off Established for Additional NGSO-Like Satellite Systems in the Ku- and Ka-Bands and V-Band*, Public Notice, DA 26-552 (June 5, 2026).

³ The limitations of the Petition for Declaratory Ruling menu selection in the International Communications Filing System require that Eutelsat use the menu selection for a new license in order to fill the necessary Form 312. Eutelsat requests that this filing be processed as a Petition for Declaratory Ruling and that the automatically generated ICFS File Number be adjusted accordingly.

strong leadership in recent years by advancing policies that expand and modernize satellite broadband connectivity across the nation. Through forward-looking spectrum management, streamlined licensing, and support for innovative satellite constellations, the Commission is fostering a more competitive, higher quality, and resilient satellite communications ecosystem that generates significant benefit for consumers, businesses, and communities in urban and rural areas. By opening the Third Ku/Ka Processing Round the Commission offers a new opportunity to bring state-of-the-art satellite services to the American public.

Eutelsat is a world leader in satellite communications, with a demonstrated track record for bringing cutting-edge connectivity solutions to customers through both geostationary orbit (“GSO”) and NGSO satellite solutions, including to governments, businesses, and communities around the world.⁴ Eutelsat’s existing NGSO constellation, the OneWeb NGSO system (“OneWeb ”), provides advanced broadband satellite connectivity to customers in the United States and around the world using over six hundred satellites.⁵ This state-of-the-art NGSO system allows Eutelsat to serve even the most remote portions of the Earth⁶ and to actively deploy products and expand partnerships to enable a range of fixed⁷ and mobility applications—

⁴ See *Multi-Orbit GEO-LEO Connectivity*, Eutelsat, <https://www.eutelsat.com/satellite-network/geo-leo-multi-orbit-satellite-network> (last visited July 3, 2026).

⁵ See *WorldVu Satellites Limited, Petition for a Declaratory Ruling Granting Access to the U.S. Market for the OneWeb NGSO FSS System*, Order and Declaratory Ruling, 32 FCC Rcd 5366 (2017); as most recently modified by *Modification of U.S. Market Access Grant for the OneWeb NGSO System*, ICFS File No. SAT-MPL-20240923-00203 (granted Aug. 14, 2025).

⁶ See, e.g., *High-Speed, Low-Latency Connectivity*, Eutelsat, <https://www.eutelsat.com/satellite-network/oneweb-leo-constellation> (last visited July 3, 2026).

⁷ See, e.g., Press Release, Eutelsat, *Eutelsat and du renew collaboration to drive broadcast excellence across MENA region* (Nov. 20, 2025), <https://www.mynewsdesk.com/eutelsat/pressreleases/eutelsat-and-du-renew-collaboration-to-drive-broadcast-excellence-across-mena-region-3417561>.

including portable,⁸ maritime,⁹ vehicle,¹⁰ and aircraft.¹¹ Eutelsat continues to expand and invest in OneWeb, including through investment in a further 440 satellites that will ensure full operational continuity for Eutelsat's customers as OneWeb satellites are progressively replaced when their operational life comes to an end.¹²

Eutelsat Next will enable Eutelsat to evolve its existing services and expand the company's ability to provide secure, resilient, high-speed, high-capacity communications services anywhere on the Earth. The additional capabilities enabled by Eutelsat Next, including steerable beams, variable channel bandwidths, and the use of inclined orbits to optimize coverage over mid-latitudes worldwide (including the Contiguous United States), will allow Eutelsat to significantly enhance its service offerings to customers throughout the United States,

⁸ See, e.g., Press Release, Eutelsat, *Eutelsat and Intellian Introduce First LEO Manpack Terminal for Government and Defence Connectivity* (Feb. 12, 2026), <https://www.mynewsdesk.com/eutelsat/pressreleases/eutelsat-and-intellian-introduce-first-leo-manpack-terminal-for-government-and-defence-connectivity-3432227>.

⁹ See, e.g., Press Release, Eutelsat, *Eutelsat and Singapore's Can Marine partner to deliver maritime connectivity services* (Feb. 23, 2026), <https://www.mynewsdesk.com/eutelsat/pressreleases/eutelsat-and-singapores-can-marine-partner-to-deliver-maritime-connectivity-services-3433869>; see also Press Release, Eutelsat, *CMA CGM Group, Marlink, and Eutelsat partner to deploy OneWeb LEO connectivity across CMA CGM's global maritime fleet* (Feb. 9, 2026), <https://www.mynewsdesk.com/eutelsat/pressreleases/cma-cgm-group-marlink-and-eutelsat-partner-to-deploy-oneweb-leo-connectivity-across-cma-cgms-global-maritime-fleet-3430119>.

¹⁰ See, e.g., Press Release, Eutelsat, *Eutelsat and Airtel Gabon Bring Rail Connectivity to Gabon* (Dec. 30, 2025), <https://www.mynewsdesk.com/eutelsat/pressreleases/eutelsat-and-airtel-gabon-bring-rail-connectivity-to-gabon-3423313>; Kymeta Hawk u8 is the First Flat Panel Antenna to be approved on Eutelsat OneWeb's LEO Network for land mobility, Business Wire (Dec. 14, 2023), <https://www.businesswire.com/news/home/20231214948989/en/Kymeta-Hawk-u8-is-the-First-Flat-Panel-Antenna-to-be-Approved-on-Eutelsat-OneWebs-LEO-Network-for-Land-Mobility>.

¹¹ See, e.g., Aviation, Eutelsat, <https://www.eutelsat.com/satellite-services/aviation> (last visited July 3, 2026); Hughes launches OneWeb LEO in-flight solutions to airlines worldwide, announces global distribution partnership with OneWeb, PR Newswire (June 5, 2023), <https://www.prnewswire.com/news-releases/hughes-launches-oneweb-leo-in-flight-solutions-to-airlines-worldwide-announces-global-distribution-partnership-with-oneweb-301842433.html>.

¹² Press Release, Eutelsat, *Eutelsat signs almost €1bn in Export Credit Agency financing for the procurement of LEO satellites for its OneWeb constellation* (Feb. 11, 2026), <https://www.mynewsdesk.com/eutelsat/pressreleases/eutelsat-signs-almost-eu1bn-in-export-credit-agency-financing-for-the-procurement-of-leo-satellites-for-its-oneweb-constellation-3431878>.

including unserved and underserved communities. As such, grant of this Petition would generate significant public interest benefits.

Included with this Petition are all the required materials for participation in the Third Ku/Ka Processing Round, including an FCC Form 312, Schedule S, Technical Attachment¹³, and Ownership Attachment.¹⁴

II. DESCRIPTION OF EUTELSAT NEXT

A. Overview and Frequency Use

Eutelsat Next would build upon the success of OneWeb by providing Eutelsat with additional capacity to provide advanced communications services to customers around the world. The system would consist of 528 satellites plus orbital spares operating in inclined orbits and would operate in the portions of the Ku- and Ka-bands specified in Table 1 below:

Type of Link and Transmission Direction	Frequency Ranges
Gateway-to-Satellite	27.5 – 29.1 GHz 29.5 – 30.0 GHz
Satellite-to-Gateway	17.8 – 18.6 GHz 18.8 – 19.3 GHz 19.7 – 20.2 GHz
User Terminal-to-Satellite	13.75 – 14.5 GHz
Satellite-to-User Terminal	10.7 – 12.7 GHz

Table 1 – Frequency Use¹⁵

¹³ Attachment 1 (Technical Attachment).

¹⁴ Attachment 2 (Ownership Attachment).

¹⁵ Eutelsat Next will also be capable of operating in the 29.1-29.5 GHz and 19.3-19.7 GHz bands, but Eutelsat does not have plans to operate in that spectrum in the United States and is not seeking U.S. market access at this time. Satellites may also be equipped with equipment for optical inter-satellite links to communicate between satellites within the system.

B. Space Segment

Eutelsat Next satellites would operate at nominal altitudes of 1,220 km. Eutelsat Next satellites would be placed into circular orbits with a 60 degree inclination, with 22 satellites in each of 24 orbital planes. These orbital parameters are detailed further in Schedule S and are designed to maximize the interoperability of Eutelsat Next and OneWeb while simultaneously enhancing the coverage of Eutelsat's NGSO services.

C. Ground Segment

The ground segment for Eutelsat Next would consist of (i) gateway earth stations, (ii) user terminal earth stations, (iii) and earth stations used exclusively for tracking, telemetry, and control ("TT&C-only" earth stations). Gateway earth stations would be used to provide TT&C to Eutelsat Next and serve as points of interconnection between user terminals and the global internet. Eutelsat Next would use approximately 50 gateway earth stations worldwide, including six earth stations currently operated in the United States with OneWeb. User terminals served by Eutelsat Next would consist of a range of terminal types, including both fixed terminals and earth stations in motion ("ESIMs"). As of this filing no TT&C-only earth stations are planned for operations in the United States, although Eutelsat anticipates having TT&C capability at some of its gateway earth stations in the United States. Eutelsat will seek the necessary licenses to communicate with earth stations using Eutelsat Next in the United States prior to commencing operations.

III. QUALIFICATIONS

This Petition satisfies all the legal and technical requirements for service to the United States market as specified in the Commission’s rules and the *DISCO II* framework,¹⁶ and grant otherwise strongly supports the public interest as discussed above.

A. Effect on Competition in the United States

Under the Commission’s *DISCO II* framework an applicant seeking access to the U.S. market for a non-U.S. licensed satellite system is entitled to a presumption in favor of U.S. market access if the applicant is licensed by World Trade Organization (“WTO”) member country to provide services covered by the U.S. commitments under the WTO Basic Telecommunications Agreement would further competition in the United States.¹⁷ Eutelsat Next will be licensed by France, a member of the WTO and signatory to the Basic Telecommunications Agreement. Accordingly, Eutelsat is eligible for the presumption that market entry of Eutelsat satisfies the competition component of the public interest analysis. This presumption is further strengthened by the robust presence of American satellite companies already operating in the French market.¹⁸

¹⁶ *Amendment of the Commission’s Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Satellite Service in the United States*, Report and Order, 12 FCC Rcd 24094, ¶ 29 (1997) (“*DISCO II*”), *on reconsideration*, 15 FCC Rcd 7207, ¶ 5 (1999).

¹⁷ *DISCO II* at ¶ 39 (“We adopt our proposal to apply a presumption in favor of entry in considering applications to access non-U.S. satellites licensed by WTO Members to provide services covered by the U.S. commitments under the WTO Basic Telecom Agreement. Specifically, we will presume that satellite systems licensed by WTO Members providing WTO-covered services satisfy the competition component of the public interest analysis.”); *see also* 47 C.F.R. § 25.137(a)(2).

¹⁸ Opinions and decisions of ARCEP, the licensing authority, are searchable at <https://www.arcep.fr/la-regulation/avis-et-decisions-de-larcep.html>. American companies providing service or authorized to provide service in France include, without limitation, SpaceX, Decision No. 2024-2687 (Dec. 19, 2023) (*see* https://www.arcep.fr/uploads/tx_gsavis/24-2687.pdf; *see also* Starlink Availability Map, <https://starlink.com/map>); Amazon Leo, Decision No. 2025-1347 (July 16, 2025) (*see* https://www.arcep.fr/uploads/tx_gsavis/25-1347.pdf); Viasat, Decision No. 2017-1192 (Oct. 6, 2017) (*see* https://www.arcep.fr/uploads/tx_gsavis/17-1192.pdf); Iridium, Decision No. 2025-2091 (Oct. 30, 2025) (*see* https://www.arcep.fr/uploads/tx_gsavis/25-2091.pdf); and EchoStar, Decision No. 2010-2010 (Feb.

Beyond these presumptions, grant of this Petition would enhance competition in the United States by enabling Eutelsat to expand the scope and quality of its services to American customers. Spurred by the pioneering efforts of OneWeb, the satellite industry has experienced an unprecedented period of growth in only a handful of years as demand for satellite connectivity continues to rise. Eutelsat Next will meet this demand by bringing state-of-the-art satellite technology to U.S. customers and in doing so will continue to drive further competition in the NGSO market, supporting the public interest.

B. Spectrum Availability and Use

Eutelsat Next would operate in portions of the Ku- and Ka-bands allocated for the provision of NGSO FSS. As detailed in the Technical Attachment included with this Petition, Eutelsat's operations would comply with all applicable technical and service rules in the frequency bands requested herein.¹⁹ Specifically, Eutelsat's operations would be compatible with co-frequency operations, including (i) GSO networks, (ii) other NGSO systems authorized in the Third Ku/Ka Processing Round, (iii) other NGSO systems authorized in earlier processing rounds, and (iv) terrestrial services.²⁰

C. National Security, Law Enforcement, Foreign Policy, and Trade

Grant of the Petition is consistent with the national security, law enforcement, foreign policy, and trade policies of the United States. The Commission has repeatedly granted market access to operators to provide service to the United States using satellites authorized by France,

16, 2010) (*see* MSS authorization to Solaris Mobile, https://www.arcep.fr/uploads/tx_gsavis/10-0210.pdf).

¹⁹ *See generally* Attachment 1 (Technical Attachment).

²⁰ *Id.* § A.8.

and has repeatedly authorized Eutelsat in particular to hold such authorizations.²¹ Further, in 2023, as part of the merger between Eutelsat and OneWeb, the United States government conducted an extensive national security and law enforcement review resulting in a Letter of Agreement between Eutelsat and the United States government which remains in effect.²²

D. Legal Qualifications

Eutelsat satisfies all the Commission's legal qualifications for the provision of satellite services to the U.S. market, as detailed in response to questions on the Commission's Form 312. Eutelsat holds numerous authorizations from the Commission and its qualifications to hold authorizations from the Commission are a matter of public record.

E. Technical Qualifications

The Technical Attachment included with this Petition includes detailed information on Eutelsat's compliance with the Commission's rules for operations in the portions of the Ku- and Ka-band spectrum requested herein.²³

IV. ADDITIONAL INFORMATION

A. ITU Filings

As detailed in the Technical Attachment to this Petition, Eutelsat Next would operate under ITU filings from the administration of France.²⁴

²¹ See, e.g., Eutelsat, ICFS File No. SAT-MPL-20210209-00019 (Granted Dec. 30, 2024) (granting modification of market access for French-licensed Eutelsat 139 West A satellite); Eutelsat, ICFS File No. SAT-PDR-20191017-00116 (Granted Apr. 8, 2020) (granting market access for French-licensed Eutelsat 8 West B satellite); Eutelsat, ICFS File No. SAT-MPL-20180908-00068 (Granted Feb. 14, 2019) (granting modification of market access for French-licensed Eutelsat 133WA satellite).

²² *Letter from Chief, Foreign Investment Review Section (FIRS) Deputy et al.* IB Docket No. 22-404 (dated July 25, 2023) (Eutelsat Letter of Agreement).

²³ See generally Attachment 1 (Technical Attachment).

²⁴ *Id.* § A.11.

B. Bond and Milestone

Eutelsat acknowledges the Commission's requirements for submission of a surety bond following grant of this Petition and Eutelsat's obligation to deploy Eutelsat Next consistent with the Commission's milestone framework for NGSO systems.²⁵

C. Mitigation of Orbital Debris

Eutelsat is a thought leader in debris mitigation and sustainable space operations and works collaboratively with regulators and other operators around the world to ensure that space remains available for valuable satellite services.²⁶ Eutelsat's operations are authorized by France and are therefore subject to the direct and effective oversight of that administration. As such, this Petition satisfies the Commission's rules for safe space operations and the mitigation of orbital debris applicable to NGSO systems seeking access to the U.S. market.²⁷ Nevertheless, Eutelsat is also providing in this Petition information sufficient for the Commission to independently determine Eutelsat's compliance with the Commission's rules for mitigation of orbital debris, as indicated in the Technical Attachment.²⁸ Because Eutelsat Next is still under design and manufacture, the information provided is necessarily forward looking. Eutelsat will update and supplement this orbital debris information as appropriate.

²⁵ Eutelsat will comply with any revised bond and milestone framework adopted in the Commission's pending rulemaking proceeding. *See Space Modernization for the 21st Century*, Notice of Proposed Rulemaking, 40 FCC Rcd 8191 (2025); *see also Space Modernization for the 21st Century*, Draft Report and Order and Further Notice of Proposed Rulemaking, FCC CIRC2607-02 (July 1, 2026).

²⁶ *See, e.g., AIAA, Orbital Safety Best Practices for Satellite Operators* (May 2026), [AIAA-Satellite-Orbital-Safety-2026-5.pdf](#)

²⁷ *See* 47 C.F.R. 25.114(d)(14)(viii).

²⁸ Attachment 1 (Technical Attachment) § A.12.

D. Ownership Information

The Ownership Attachment includes information on the current ownership of Eutelsat as required by Form 312.²⁹

V. CONCLUSION

For the foregoing reasons, grant of this Petition would be consistent with the Commission's rules and policies and serve the public interest by enhancing Eutelsat's ability to provide innovative, advanced satellites services to customers in the United States. Eutelsat therefore requests expeditious grant of the Petition.

²⁹ Attachment 2 (Ownership Attachment).