Lexington Institute Comments to the FCC

October 2, 2026

Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of Application by Amazon Leo for NGSO D2D System

DA 26-866

The Lexington Institute appreciates this opportunity to respond to Opposition to the Petition. In summary, the Lexington Institute responds in favor of the FCC granting the Amazon Leo NGSO D2D application, which will contribute to the burgeoning, competitive market for D2D and the wider space economy, and counter China's recent entries into the global race for D2D. In addition, the Lexington Institute concluded that none of the opposition comments as submitted demonstrated public harm or reasons to deny the application.

Commercial investment in Direct-to-Device (D2D) satellite communications has burgeoned over the past year, with a range of business mergers, new investments and partnerships pursuing innovative business models for D2D services. As part of this process, Amazon Leo (formerly Kuiper) filed an application with the Federal Communications Commission to launch and operate up to 5,105 satellites in Non-Geostationary Orbits (NGSO). Amazon Leo's D2D will connect smartphones and other mobile devices directly from space with greater speed and throughput for billions of customers where mobile is the primary method of internet connection. Amazon Leo's definitive, pending acquisition of Globalstar and partnership with Apple will enhance services.

The FCC should approve the application for this new constellation. The D2D market is set to become an essential element of America's space economy. American leadership is also important for national security in the face of competition from China and others. The big picture is that D2D is poised to move beyond niche applications, and Amazon Leo should be granted permission to proceed and add to the American competitive options.

The Lexington Institute wishes to highlight four arguments in response to the opposition comments which that already been received. First, it should be noted that, while several opposition comments and points of concern have been received by the FCC, no submitted comments demonstrated public harm, a rule violation, or an interference concern that is backed up by engineering analysis. For example, NASA has a well-established history of submitting comments to the FCC on the topic of large constellations, due to fears of collisions and interference with NASA's long-standing Earth-gazing missions. In 2022, NASA fretted over a SpaceX application for 30,000 LEO satellites for much the same reason. However, Amazon Leo meets or exceeds all orbital debris mitigation requirements, and NASA acknowledged Amazon's "robust collision avoidance." According to public filings, Amazon Leo has taken a number of

technical steps to ensure safe operation of its D2D satellites. Propellant tanks are engineered to crumple and leak rather than burst into fragments.

Second, granting the Amazon Leo NGSO D2D application will be consistent with the FCC's recent decisions to empower the fast-growing U.S. space economy. The FCC's Space Innovation Agenda and active reviews of space policy and licensing have kept up a brisk pace to ensure that lackadaisical regulation does not hold back the U.S. space economy. The FCC, and in particular the Space Bureau, has been on a mission to process licenses and applications much faster. FCC Chair Brendan Carr confirms the Space Bureau cut agency licensing backlogs by 43% in 2025 and a further 15% in 2026.

Third, by granting this application, the FCC will encourage competition in D2D. The popular images of hikers consulting cell phones in remote locations and influencers uploading catchy videos on rock formations are about to give way to a wider D2D market. Starlink rebranded as Starlink Mobile in early 2026 and claims it operates "the world's largest and only satellite to mobile constellation. Starlink's direct-to-cell calls began in 2024 and currently can deliver continuous voice, video, and messaging on five continents, according to SpaceX President and COO Gwynne Shotwell. New Zealander Sir Peter Beck's Rocket Lab is acquiring Iridium to grow a network offering specialized global services to marine, aviation and other sectors. In May, AT&T, T-Mobile, and Verizon formed a D2D joint venture to fill in gaps.

Fourth and finally, the FCC should move quickly to grant Amazon Leo's license due to the rising level of international competition, both friendly and otherwise. European satellite imaging company Iceye has partnered with Nokia to offer sovereign broadband from LEO. This is a case of a successful imaging satellite company expanding into D2D.

However, of much greater concern, China is also in the race for D2D and will no doubt push for global market share given the importance that the Chinese Communist Party is placing on space. Chinese firm Spacesail completed direct-to-device telephone calls just a few weeks after launching two new satellites in June 2026. Spacesail said this was China's first D2D test and delivered voice quality equivalent to 5G. The broadband delivery market is going global fast, and China will start competing for those billions of customers unless the U.S. fields numerous healthy competitive options such as Amazon Leo.

The FCC is clearing the way for a flourishing space economy. Granting the Amazon Leo NGSO D2D application will help the U.S. space economy thrive as it embraces competition.