30 June 2026

Department of Infrastructure, Transport, Regional Development,
Communications, Sport and the Arts
Attention: Assistant Secretary, Triple Zero Custodian Operations
Triple Zero Custodian Division
GPO Box 594
CANBERRA ACT 2601
Australia

Subject: Skylo Technologies, Inc. Response to the Triple Zero Custodian's Consultation Paper "Triple Zero Legislative and Regulatory Review"

Dear Assistant Secretary:

Skylo Technologies Inc. (Skylo) sincerely appreciates the opportunity to submit a response to the Public Consultation on Triple Zero Legislative and Regulatory Review. Skylo provides its narrowband non-terrestrial network (NB-NTN) Direct-to-Device (D2D) services in Australia.

Skylo commends the Triple Zero Custodian for undertaking this Review and for recognising the role that emerging delivery technologies can play in strengthening access to Triple Zero. As a D2D provider that partners with OEMs to enable emergency services access when users are outside of terrestrial coverage, Skylo shares the Triple Zero Custodian's mission of safeguarding reliable, resilient access to emergency assistance for all members of the public, wherever they are located.

Our comments are guided by three themes:

1) the framework should remain technology-neutral and outcomes-based;
2) satellite D2D and OEM-enabled emergency services are complementary to, and not substitutes for, the primary voice telephony path; and
3) obligations designed for primary carriers, CSPs and ECPs should not be pre-emptively expanded to nascent, voluntary complementary services in ways that would discourage their continued availability.

We remain available to support the Triple Zero Custodian in its Review, and to assist the Australian Communications and Media Authority's (ACMA's) public safety communications efforts more broadly.

Sincerely,

[redacted]

Mindel De La Torre
Head of Global Regulatory Affairs
Skylo Technologies, Inc.
[redacted]

[redacted]

Natcha Techachainiran
Director of Regulatory Affairs
Skylo Technologies, Inc.

I. About Skylo Technologies, Inc.

Skylo was founded to bridge coverage gaps allowing standard cellular devices to transmit signals via satellite when out of range of traditional cell towers. Skylo's NB-NTN Mobile Satellite Service (MSS) provides network components that seamlessly extend the cellular experience, ensuring continuous coverage if devices have a clear view of the sky. Currently, Skylo offers a real-time 24/7 direct-to-device (D2D) service, spanning five continents, authorised in 41 countries, including Australia, covering over 75 million square kilometres and with more than 18 million activations.

Skylo's service utilises existing satellite infrastructure, primarily geostationary (GEO) satellites, though it is also compatible with low earth orbit (LEO) satellites. This D2D NB-NTN service is compatible with 3GPP Release 17 standards (and beyond) and operates over dedicated, licensed MSS L- and S-band spectrum, enabling standard mobile phones, wearables, and Internet of Things (IoT) devices to connect directly to satellite infrastructure.

Skylo operates over standardised 3GPP Release 17 NB-NTN cellular modems, which ensures interoperability with the existing terrestrial mobile ecosystem. This allows satellite and terrestrial mobile services to function seamlessly, similar to standard roaming today. Additionally, since Skylo currently utilises existing GEO satellites in MSS spectrum bands, no new capital-intensive expenditures are required. This integration simplifies the regulatory framework and provides a more cohesive and user-friendly experience for individuals and businesses alike.

Skylo has various business models for service provision: it works directly with Mobile Network Operators (MNOs) such as Verizon, Vodafone, Orange, Deutsche Telekom, Telefonica, Tele2, Charter Communications and Comcast, or with original equipment manufacturers (OEMs) such as Google and Garmin.[1]

[1] https://iot.vodafone.com/news-and-insights/vodafone-iot-partners-with-skylo-to-bring-ntn-nb-iot-satellite-connectivity; https://www.skylo.tech/newsroom/skylo-connectivity-enables-new-satellite-sos-feature-on-google-pixel-9-series; https://www.skylo.tech/newsroom/orange-becomes-the-first-european-operator-to-offer-satellite-sms-service-with-skylo; https://www.skylo.tech/newsroom/google-and-skylo-expand-satellite-connectivity-to-pixel-10-series-and-unveil-pixel-watch-4; https://www.skylo.tech/newsroom/skylo-expands-collaboration-with-garmin-to-bring-satellite-connectivity-to-new-fenix-r-8-pro-smartwatches; https://www.verizon.com/about/news/verizon-skylo-launch-direct-device-messaging-customers; https://www.skylo.tech/newsroom/skylo-certifies-the-samsung-galaxy-s25-series-on-verizon; https://www.skylo.tech/newsroom/skylo-expands-deutsche-telekom-s-converged-cellular-and-satellite-connectivity-to-iot-applications; https://www.skylo.tech/newsroom/o2-telefonica-and-skylo-deliver-hybrid-cellular-non-terrestrial-network-ntn-coverage;

Skylo's customers (i.e., MNOs and OEMs) focus on the provision of emergency and safety services to end-users. In an emergency such as seasonal flooding, wildfire, severe storm, maritime, backcountry or automobile accident, affected users of a Skylo OEM partner can connect to an emergency response centre which then coordinates with a government-designated search and rescue centre to determine which local entity would manage the emergency response. Currently, device manufacturers generally provide emergency satellite service as a feature of the phone free of charge. In an MNO-led model, affected users can directly message their personal contacts using the Skylo NB-NTN service when outside of coverage areas to seek emergency assistance or simply to maintain contact.

In the United States, where Skylo presently has the greatest number of connected users, emergency SOS over Skylo's network deploys life-saving service for acute medical emergencies and other urgent situations on a near-daily basis. Since service inception, hundreds of confirmed emergency SOS incidents have been resolved over Skylo's network, spanning vehicle collisions and breakdowns, acute medical emergencies, fires, hurricanes and other imminent hazards, lost persons, injured hikers, and wildlife encounters. Approximately two-thirds of these incidents involved vehicle collisions, mechanical failures, or vehicles becoming stranded, frequently in remote terrain where the user was beyond terrestrial coverage and had no other means of calling for help. In one representative case, a satellite SOS activation allowed emergency services to dispatch an ambulance for a child who had suffered a head injury in a remote area, who was then transported to a medical facility for treatment. These are not hypothetical benefits; each incident represents a real person who reached emergency assistance from a location where terrestrial networks could not. Given the scale of Australia's remote and unserved terrain, this same capability offers a critical emergency lifeline for those beyond the reach of terrestrial networks.

II. Response to Consultation Questions

Question 1: What principles should guide Triple Zero service regulation in the contemporary telecommunications environment? How should these be reflected in the legislative and regulatory framework?

Skylo commends the Triple Zero Custodian for recognising the emerging importance of D2D services in expanding access to emergency services in Australia. We respectfully note that Geostationary (GEO), and not just Low Earth Orbit (LEO), satellites play a role in D2D services. As

https://www.skylo.tech/newsroom/tele2-first-swedish-operator-to-launch-satellite-iot-connectivity-with-skylo; and https://www.skylo.tech/newsroom/charter-and-comcast-launch-satellite-connectivity-for-mobile-devices.

previously mentioned, when users in Australia are outside terrestrial coverage, they can reach Garmin's Alerting Post over GEO satellites via Skylo's system; in turn, the Alerting Post contacts the relevant emergency authority to dispatch emergency assistance.

Skylo submits that Triple Zero regulation should be technology-neutral and outcomes-based, focused on the reliable delivery of emergency contact rather than on any particular network or device technology. The framework should recognise that new delivery channels, including satellite D2D and native OEM emergency SOS, now complement traditional voice telephony, and should be drafted flexibly enough to accommodate emerging technologies as they mature. The primary responsibility for carrying Triple Zero voice calls should continue to rest with mobile network operators and voice telephony providers, with complementary channels treated as additions rather than as substitutes subject to the same obligations.

Question 2: Are there any barriers in the current legislative and regulatory framework blocking access to the benefits of new delivery technologies which could be used to contact Triple Zero? If so, what aspects of the legislative and regulatory framework need to be amended to increase flexibility?

Skylo does not consider the current framework as blocking access to new delivery technologies. Skylo's network is already capable of carrying emergency SOS messages from users in Australia, routing them via satellites to a global Emergency Response Centre (operated by the device OEM's provider) that coordinates with the relevant emergency authority. This demonstrates that complementary, satellite-enabled emergency access can operate effectively within the existing framework. Skylo therefore recommends that the framework be clarified and future-proofed, recognising satellite D2D and OEM-led emergency services as legitimate complementary pathways, so that future amendments do not inadvertently extend carrier-grade voice obligations to these voluntary services in a way that would discourage their continued availability and life-saving benefits.

Question 3: How should the legislative and regulatory framework balance multi-modal access to Triple Zero, when compared to reliability and redundancy?

Multi-modal access strengthens, rather than reduces, the reliability and redundancy of the Triple Zero system. Satellite D2D provides a backup lifeline precisely when terrestrial networks are congested, damaged, or out of range, reducing single points of failure within the system. Skylo submits that the framework should encourage emerging Triple Zero access modes, such as OEM-enabled D2D emergency services, while recognising that different modes come with highly varied technical characteristics. For example, while satellite D2D performance continues to improve rapidly, contacting emergency services this way currently requires the user to be outdoors with a clear line of sight to the satellite, and relies on messaging rather than voice. Accordingly,

complementary modes should not be held to the same quality-of-service thresholds as primary voice telephony.

Question 4: Should the legislative and regulatory framework allow for the ACMA, and/or the Minister, to determine which class of devices or technologies should or should not be able to reach Triple Zero, in order to safeguard the integrity of access for the system?

Skylo supports safeguarding the integrity of the Triple Zero system but cautions against a regime that pre-emptively excludes whole classes of devices or technologies, which risks shutting out life-saving emergency access from satellite-capable phones, wearables, and IoT devices. In practice, system integrity is already well protected: Skylo's services operate to recognised industry standards (including 3GPP), and they function only as a complementary fallback, a device connects to the satellite link only when it is outside terrestrial coverage, so satellite D2D supplements the primary Triple Zero path rather than competing with it. Skylo therefore submits that new prescriptive powers are not necessary to achieve the desired outcome. To the extent the ACMA or the Minister retain any power in this area, it should be a narrowly-scoped reserve power, exercised only as a last resort where there is clear evidence of harm to the system, and applied transparently and proportionately rather than as a pre-emptive technology ban.

Question 5: Should mobile device manufacturers be considered more centrally in the Triple Zero legislative and regulatory framework (such as under the ECS Determination)? What, if any, additional requirements should apply to mobile device manufacturers to ensure mobile devices can reliably contact Triple Zero on Australian networks?

No comment.

Question 6: What outcomes should carriers, CSPs and ECPs be accountable for in delivering Triple Zero calls, and what minimum requirements are needed to achieve those outcomes?

Skylo supports an outcomes-based, technology-neutral approach in which accountability is calibrated to each party's actual role in delivering a Triple Zero call. The primary outcome, that a genuine emergency call is reliably carried to the correct termination point, should rest with the carriers, CSPs and ECPs that form the primary voice telephony path. Skylo cautions against extending these same minimum requirements to complementary, voluntary fallback services such as satellite D2D, which today carry OEM-enabled emergency SOS rather than Triple Zero voice calls, and operate with materially different technical characteristics. Minimum requirements designed for primary providers should not be mapped onto emerging complementary modes, as doing so risks discouraging the very services that extend emergency reach beyond terrestrial coverage.

Question 7: How could the framework be amended to further provide obligations to support the proactive identification and rectification of systemic issues? What mechanisms (for example, incident learnings, mandatory improvement plans, directions, audits) are most effective, and why?
No comment.

Question 8: Should new and ongoing performance reporting for carriers and/or CSPs providing access to Triple Zero be introduced? If yes, what metrics should be reported and how often?
Skylo does not oppose proportionate, outcomes-focused performance reporting for providers within the primary Triple Zero delivery chain, provided it does not duplicate existing obligations. Such reporting should not, however, extend to complementary D2D services: metrics built for terrestrial voice networks (e.g., call-completion and latency benchmarks) do not translate to satellite D2D messaging, and would impose a disproportionate burden on a nascent, voluntary service for little meaningful insight. Reporting should remain technology-neutral in principle but be applied according to each provider's actual role.

Question 9: What information is and should be shared across industry and/or ESOs to support the proactive, reliable and future-proof delivery of Triple Zero. What governance arrangements are needed to enable timely, secure and usable information sharing?
No comment.

Question 10: Does the objective of the single national emergency call system encourage, or hinder, the ability for state and territory organisations to innovate in their delivery of emergency calling and dispatch services?
No comment.

Question 11: Is there information that carriers, CSPs, and ECPs hold which is not currently, but should be made available to ESOs through regulation to support the delivery of emergency services?
No comment.

Question 12: Are there any additional regulatory powers and mechanisms the ACMA requires to regulate Triple Zero, especially to support a framework which is proactive and future-focused?
No comment.

Question 13: Are there barriers to the ACMA considering systemic Triple Zero issues, or linking related infringements, to ensure issues indicating broader problems are addressed appropriately? If yes, what should change?
No comment.

Question 14: Do recent changes to the TCPSS Act effectively balance the role of the ACMA as a regulator with the role of the Custodian as an entity which oversees the Triple Zero ecosystem as a whole?

No comment.

Question 15: Does the Triple Zero Custodian have all the powers needed to fulfil its functions under the TCPSS Act?

No comment.