



24 October 2025

Re: Consultation on Universal Outdoor Mobile Obligation (UOMO) Draft Obligation

AST & Science, LLC (AST SpaceMobile) respectfully submits these comments in the above-referenced consultation. We appreciate and support Australia's efforts to create a regulatory regime that ensures all users across Australia have access to high-quality communications.

AST SpaceMobile is developing the foundation for an increasingly interconnected society with the deployment and operation of its space-based mobile broadband network providing service direct to user devices. Following launch of its BlueWalker test satellites in April 2019 and September 2022, AST SpaceMobile successfully demonstrated the technical feasibility of its groundbreaking satellite-to-cellular architecture delivering space-based 4G LTE and 5G broadband connectivity to standard, unmodified terrestrial mobile devices. More recently, in September 2024, AST SpaceMobile launched five first-generation BlueBird Block 1 (BB1) satellites, offering 10 times higher throughput than the BlueWalker test satellites. AST SpaceMobile has successfully completed the first video calls from space with its mobile network operator partners, Vodafone, AT&T, and Verizon, using standard, unmodified smartphones.<sup>1</sup>

AST SpaceMobile's planned next-generation BlueBird Block 2 (BB2) satellites, which will begin launching this year, feature the largest communications array ever to be deployed in low Earth orbit for commercial service, delivering up to 10 times the bandwidth capacity of the first-generation BB1 satellites.<sup>2</sup> The FCC recently granted experimental authorization to AST SpaceMobile to launch its FM-1 satellite and the application for AST SpaceMobile's 248 satellite low band network is currently pending at the United States Federal Communications Commission with plans for AST Space Mobile to launch 60 satellites through 2026. AST Space Mobile is also planning for its mid-band space-based mobile broadband network which will include MSS frequency bands and will begin deployment in the next year.

Following FCC approval for our BB2 satellite network, we will begin working with MNO partners in Australia and globally to deploy our space-based broadband mobile services direct to consumer unmodified devices. This deployment will bring a competitive satellite operator to Australia for UOMO services.

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<sup>1</sup> See *AST SpaceMobile Makes History in Cellular Connectivity, Completing the First-Ever Space-Based Voice Call Using Everyday Unmodified Smartphones*, AST SpaceMobile (2025), <https://ast-science.com/2023/04/25/astspacemobile-makes-history-in-cellular-connectivity-completing-the-first-ever-space-based-voice-call-usingeveryday-unmodified-smartphones/>.

<sup>2</sup> AST Space Mobile has designed its BB2 satellites to be fully demisable when they de-orbit. In addition, AST SpaceMobile has been working with the radio astronomy and optical astronomy community to mitigate any potential issues.



AST SpaceMobile fully supports the requirement for technology neutrality for meeting the UOMO obligation. By requiring technology neutrality, it will allow the operators subject to the draft Act to choose a technology that works best for them.

AST SpaceMobile, supports the flexibility the draft obligation provides to the Minister in relation to items such as performance standards, coverage and the like. AST SpaceMobile supports the initial requirement for the UOMO being limited to voice and SMS texts. For the MNOs to offer broadband, it will require the deployment of additional ground facilities (i.e., gateways). As these facilities are deployed, broadband will be available as part of the UOMO as long as sufficient spectrum is available under the necessary licence conditions. Accordingly, a flexible approach is required.

In addition, AST SpaceMobile is concerned about the additional costs to the MNOs of this proposal. AST SpaceMobile supports appropriate universal service funding to be provided to support this expansion. However, AST SpaceMobile also notes the very large costs which would be associated with serving the external territories, where gateway earth stations would need to be constructed in order to preserve Australian sovereignty and control. Because of these costs, AST SpaceMobile suggests that the issue of external territory coverage be considered later as the government has more experience with UOMO.

Of equal importance is the need for access to spectrum to meet the UOMO requirements. The Government's proposed timeframes are ambitious, particularly given restrictions on low-band use due to ASKAP and the lack of alternative suitable bands. Notably, 1.8GHz and 2.1GHz are currently apparatus-licensed in many of the areas where these services would be most beneficial.

We also note that integrating satellite services with terrestrial mobile networks presents is technically complex. Satellite infill near urban regions on shared spectrum risks interference and congestion with existing terrestrial networks. Therefore, the UOMO should not include metropolitan areas.



Based on the foregoing, AST SpaceMobile supports the proposed UOMO obligation but suggests the government consider the later inclusion of broadband as a required service, as technology evolution, spectrum availability and deployment costs allow. The provision of appropriate funding and addressing the issue of restrictions resulting from ASKAP on the use of low band frequencies for use for space-based connectivity will also facilitate the timely introduction of UOMO as envisioned in the draft Bill.

Please contact the undersigned with any questions.

Respectfully submitted,

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Regulatory Affairs and  
International Strategy  
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