

### **PUBLIC UTILITIES COMMISSION**

# DECISION (APPLICATION FOR CLASS LICENCE FOR INTERNET SERVICE PROVIDER)

for

STARLINK BELIZE, LLC
JANUARY 2025

#### I. LEGAL FRAMEWORK

- The Public Utilities Commission, (the "PUC"), established by virtue of the Public
  Utilities Commission Act (the "PUC Act"), has the statutory authority to regulate
  the electricity, telecommunications, water and wastewater sectors in Belize. The
  PUC is also the regulator for the electromagnetic spectrum.
- 2. Pursuant to the Belize Telecommunications Act (the "*Telecoms Act*"), the PUC is vested with the power to make or establish regulations and procedures that govern the granting of licenses.
- **3.** The Telecommunications (Licensing Classification, Authorisation and Fee Structure) Regulations (the "*Regulations*"), as amended from time to time, govern the issuance of Individual or Class Licenses by the PUC.
- **4.** As it relates to the provision of Internet Service, Regulation 4(3) of these Regulations specifies that a Class Licence is required to build, own and operate a network to provide wireless access for the provision of public Internet access services. The holder of a Class Licence can have access to the *non-exclusive* use of a specified radio frequency or radio frequency band.
- 5. As most of the PUC's decisions affect the general public in Belize, the Telecoms Act requires that the PUC solicits input from members of the public who are likely to be affected by its decision.

#### II. STARLINK BELIZE, LLC'S APPLICATION

6. Starlink Belize, LLC ("SBL" or "the Applicant") applied to be an Internet Service Provider ("ISP") and paid the requisite Application Fee on October 08, 2024. The Applicant also published the required public notices pursuant to Regulation 6(3) of the Regulations, copies of which are included in Schedule 1.

- 7. The Applicant's public notice sparked a nationwide dialogue, and the PUC received a record number of representations, in support of and against the application. The full compilation of comments received from the public can be found on the PUC's website at: <a href="https://www.puc.bz/wp-content/uploads/2024/10/Website-Upload-Public-Consultation-Representations-Starlink-Bellize-LLC-application-for-ISP-Licence-Retracted-Comments-Web.pdf">https://www.puc.bz/wp-content/uploads/2024/10/Website-Upload-Public-Consultation-Representations-Starlink-Bellize-LLC-application-for-ISP-Licence-Retracted-Comments-Web.pdf</a>.
- 8. The PUC reviewed the application and sought clarification from the Applicant on October 10, 2024, regarding the intended service packages, customer contract, and business plan, amongst other matters and received SBL response on October 31, 2024.
- 9. A full summary of the public representations, inclusive of those from key stakeholders in the telecommunications sector ("the Stakeholders"), the PUC's questions to the Stakeholders and the Stakeholder's responses are compiled and can be found in Schedule 2.

#### II. SUMMARY OF SBL'S APPLICATION

- **10.** The Applicant proposes to provide broadband internet service to its customers through its constellation of satellites. The company's current commercial packages are divided into Personal and Business plans.
- 11. The Applicant proposed the following service offerings for Belize:
  - a. Starlink Standard Service: Starlink standard service is expected to offer speeds in the home of 30-150 Mbps download and up to 20 Mbps upload.
  - b. Starlink Priority Service: Starlink priority service is expected to offer speeds of 40-200 Mbps download and up to 25 Mbps upload.
  - c. Starlink Mobile Earth Station in Motion ("ESIM"): Starlink seeks authorization to offer its packages on board ships, boats, planes, trains, and vehicles to make connectivity truly possible from any location, allowing for

- unparalleled connectivity.
- d. Community Gateways: Starlink satellites can deliver fiber-like speeds with local providers distributing connectivity to homes, businesses, and governments using last-mile fiber, fixed wireless and mobile wireless.
- 12. SBL provided the following additional information in their application, concerning:
  - a. 11(c) above:

"It is important to add that if an additional license is required to add ESIM, Starlink will be applying accordingly, however, it is important to note that our user terminals for ESIM use exactly same spectrum and technical configuration as our fixed terminals. Therefore, we request authorization for ESIM as it uses the same system and technology."

b. 11(d) above:

"Starlink is not seeking license and spectrum authorization to deploy a gateway in Belize at this moment."

- 13. In summary, then, SBL is applying for a licence:
  - a. To provide **fixed** broadband internet services to the public; and
  - b. To offer <u>mobile</u> internet services for <u>aeronautical</u>, <u>maritime</u>, and <u>terrestrial</u> use (more generally referred to and defined above as ESIMs).
- 14. It is important to note that the present Regulations permits the use of ESIMs by private and commercial aircrafts and vessels but do not allow for fixed/terrestrial use. As such, the issue before the PUC is whether or not grant SBL a licence to provide <u>fixed</u> internet services to the public.

#### III. <u>DECISION PROCESS</u>

- **15.** In reaching its decision, the PUC is mandated under the Regulations to take the following into account:
  - a. The matters set out in the application;
  - b. Any submissions received from the public;
  - c. Criteria set out in Section 16 of the Telecoms Act; and
  - d. Any other relevant matters.

#### Matters set out in the application

**16.** An applicant that seeks approval in respect of an *ISP* Class Licence is required to provide relevant forecasts, proposed packages and prices, proposed terms and conditions, vendor-provided technical documentation and other relevant explanations.

#### 17. The SBL application is unique in that:

- a. It represents the first applicant that proposes to provide internet services to the public by deploying mass satellite broadband internet user terminals, supported by a constellation of Low Earth Orbit satellites.
- b. The proposed service offering is not only limited to fixed broadband services, but also includes the licensing of aeronautical, marine and terrestrial ESIMs.
- c. SBL proposes to offer its services directly to consumers and enterprise clients without maintaining a physical presence in Belize. According to SBL, once connected, SpaceX's Network Operations Center and customer success teams are responsible for delivering consistent, reliable service and troubleshooting/resolving issues with user connections. The Starlink support team provides 24/7 response support to customer inquiries via the www.starlink.com user account portal or through the Starlink mobile

- application.
- d. SBL claims that, to date, all customer issues have been resolved remotely or with a replacement User Terminal.
- e. In summary, the proposed solution is a vertically integrated end-to-end ecosystem.
- 18. SBL provided an updated forecast in their business plan as follows:

Income Statement						
Income Statement (\$ USD)	2025	2026	2027	2028	2029	
Subscription Fee						
Total Subscribers						
Subscription Revenues						
Dish Price						
Starlink Kit Revenues						
Shipping & Other Equipment Revenues						
Total Revenues						

- 19. In response to the proposed service plans pricing, SBL, in its initial submission, directed the PUC to pricing scheme applicable to their Trinidad & Tobago customer base.
- **20.** SBL subsequently responded to the PUC's request for the proposed plans and pricing for Belize by providing a link with the service plans available currently in El Salvador, as example of the pricing structure for Belize.
- 21. Since the prices reflected in the link would not be the exact prices for Belize, but instead were provided to show the average of prices in the region, the PUC could not ascertain the pricing for the Belizean customer base.
- **22.** SBL did not initially include copies of sample customer contracts for the proposed customer classes, so the PUC sought a response from SBL.
- 23. In reply, SBL stated that it offers services directly to consumers and enterprise clients and has adopted a transparent commercial model that imposes no data caps,

long-term contracts, early termination charges, or other hidden fees. SBL further stated that this model ensures that SpaceX operates its constellation with the user experience at the center of its focus and continues to innovate its services and technologies.

- **24.** Additionally, SBL provided a link described as "Starlink Service Terms that are available for every custumer (sic) prior ordering our service". This link was for Starlink Trinidad and Tobago, and SBL indicated that there would be a similar page set up for Belize.
- 25. As such, at the date of this decision, the PUC does not have the proposed pricing for the service offerings nor the accompanying proposed terms and conditions for Belize.

#### The Criteria set out in Section 16 of the Telecoms Act

- 26. In granting a Licence, the PUC may among other relevant factors, have regard to:
  - a. the public interest and the likelihood of unfair practices;
  - b. any element of national interest, policy or security;
  - c. the technical and electromagnetic compatibility of the application with any other licensed service;
  - d. the extent of technical feasibility and economic reasonableness, and the promotion of universal access throughout Belize; and
  - e. any agreement between Belize or the PUC with any national or international organization relating to telecommunications.

#### The public interest and the likelihood of unfair practices

27. It is clear that SBL can provide services to both unserved and underserved areas of the country; however, the PUC is unable to ascertain its affordability, given that SBL has only provided regional reference prices. In the absence of this information, the PUC cannot say definitively that SBL can provide equitable access to those in

economically disadvantaged and unserved areas. The absence of Belize-specific proposed pricing and terms and conditions does not allow further evaluation.

- 28. The PUC does note that Starlink has been accused of predatory pricing<sup>1</sup> in other countries such as in Indonesia and Kenya. In the former case, the antimonopoly agency found that the pricing was not predatory, while in the Kenyan case, the regulator opted not to investigate the complaint.
- 29. The Association of Telecommunication Companies of Nigeria reportedly demanded a full review of Starlink's operation after it increased its subscription fee almost two-fold without regulatory approval. The regulator, the Nigerian Communications Commission, has commenced enforcement action<sup>2</sup> against the price hike.
- **30.** For the most part, the PUC does not regulate rates unless it has made a determination that a licensee is a dominant provider. Thus, rates for telecommunications services are determined by the market's supply and demand principles.
- 31. While there is the need to provide broadband services in the unserved and underserved areas of the country, the PUC needs to weigh this against the issuing of a licence to an entity that cannot be wholly regulated within its jurisdiction. The PUC would not have the resources to deal with matters such as quality control and would have limited control over matters such as predatory practices, unreasonable price increases or unreasonable terms.

<sup>&</sup>lt;sup>1</sup> https://www.businessdailyafrica.com/bd/corporate/technology/starlink-sustains-price-cuts-despite-local-firms-outcry-4850324

https://developingtelecoms.com/telecom-technology/satellite-communications-networks/16786-starlink-s-indonesia-pricing-is-not-predatory-antimonopoly-agency.html

<sup>&</sup>lt;sup>2</sup> https://spaceinafrica.com/2024/10/08/nigerian-communications-commission-responds-to-starlinks-unapproved-price-hike/

#### Elements of National Interest, Policy or Security

- 32. SBL's proposed model, i.e. foreign-based and direct sales to customers, is not expected to contribute to the country's workforce development. SBL's business plan points to a limited potential contribution to national revenue through taxes and other financial commitments.
- 33. In their objection, the industry stakeholders stated that allowing SBL to operate in and control a part of the communications infrastructure, while being a foreign entity, raises issues regarding data sovereignty, security risks, and compliance with local data protection laws in Belize. The PUC is unaware of legislation mandating the need to store and process data locally in order to protect citizens' privacy and ensure data sovereignty.

#### Technical and Electromagnetic Compatibility with other Licensed Services

- **34.** SBL has yet to formally seek Spectrum Authorisation, and the PUC has likewise not issued a determination. Based on the application, however, the PUC can assess and establish the spectrum requirement as indicated therein by the applicant.
- **35.** The SBL system requires authorisation to utilize, on a shared basis, spectrum in the Ku band, as follows:

Frequencies	Bandwidth	Use
10.7-12.7 GHz	2000 MHz	User Terminal Downlink (s->E)
14.0-14.5 GHz	500 MHz	User Terminal Uplink (E->s)

36. The 14.0 – 14.5 GHz range is allocated to Fixed-Satellite (Earth-to-space) services on a primary basis in the Belize National Frequency Allocation Table ("NFAT"). There are no known assignments in this range. As such, the assignment of this band, on a non-exclusive basis, is not anticipated to be the subject of, nor the cause of interference to other licensed services.

- 37. The 10.7 12.2 GHz range is allocated to Fixed-Satellite (space-to-Earth) services on a primary basis in the NFAT; the range 10.7 to 12.1 GHz is co-shared with the Fixed services on a primary basis.
- **38.** In Belize, the range 10.7 to 11.7 GHz is utilized to deploy fixed Point-to-Point links. The channelization plan allows for twelve (12) 40 MHz paired channels to be assigned. To date, four (4) of the twelve are known to be assigned for use.
- **39.** The PUC adopts the Federal Communications Commission of the USA position on the use of 10.7 to 11.7 GHz band<sup>3</sup> for space-to-Earth satellite communications; the use of this band is on an unprotected basis with respect to present and future fixed services.
- **40.** The remaining range for 12.2 12.7 GHz is presently allocated to the Broadcasting-Satellite services on a primary basis and not to Fixed-Satellite services. Further deliberations are required to form a position on this particular SBL requested range.
- **41.** In summary, SBL's Earth-to-space requirement is feasible for authorisation; however, the Space-to-earth request can only be accommodated in part and subject to the above.

#### Technical feasibility, economic reasonableness, universal access

42. The PUC has yet to invoke sections 33 and 34 of the Telecoms Act, which in part calls for determining which public telecommunications services should be classified as a part of universal service requirements. Universal service is a minimum level of telecommunication service, as determined by the PUC, to be provided by a Licensee to an area, areas, or sector not served or adequately served with a determined telecommunication service. This points to delivering services in unserved and underserved areas, which SBL is poised to address.

<sup>&</sup>lt;sup>3</sup> https://www.ecfr.gov/current/title-47/chapter-I/subchapter-B/part-25

43. Whereas the PUC has not made a determination with respect to universal services obligations, there is no doubt that SBL services, being satellite-based, have the high potential to reach the presently unserved areas within the territory of Belize by providing access to high-speed fixed broadband services. Voice and video services are possible by using Over-the-top services.

#### Agreement between Belize or the PUC with other national or international entities

44. There are no known border coordination requirements that would affect SBL's frequency authorisations. SBL has further stated that, at present, they are not seeking authorisation for a gateway; therefore, no filings with the International Telecommunications Union are required regarding gateway or earth station operations.

#### Other relevant matters

- **45.** SBL is the first applicant but the PUC expects to see a ramp-up in applications as additional entities launch their commercial services, such as:
  - a. Amazon's Project Kuiper expected to similarly target consumers and enterprises;
  - b. OneWeb expected to target enterprise and government markets; and
  - c. Telesat's (Lightspeed) expected to focus on enterprise, government and mobility markets.

#### IV. FINDINGS

- **46.** The PUC is mandated to promote reliable, affordable, high-quality telecommunication services that are accessible to Belizeans in urban and rural areas in all regions of Belize, and to foster increased reliance on market forces for the provision of telecommunications services.
- 47. The above mandate needs to be balanced with the requirement to ensure and promote fair pricing and the use of cost-based pricing methods by providers in Belize and protect the interests of telecommunications users, service providers, and consumers.
- **48.** SBL's application proposed new and untested services for Belize's regulatory regime. The innovative solution has the potential to disrupt the existing market while also providing a niche solution to the unserved or even underserved population. The PUC needs to fully understand the implications of allowing an ISP licensee to leverage advanced satellite technology.
- **49.** The PUC finds that the present ISPs, inclusive of the Stakeholders, are unable, in the short term, to provide services in the unserved areas; however, the PUC is also not convinced that providing service in these coverage gaps merits a full-fledged class licence ISP.
- **50.** In addition to being a potential solution for addressing the needs of the presently unserved, the PUC is of the view that satellite-based solution can also serve and facilitate the following:
  - a. Scientific research stations in remote or extreme environments;
  - b. National security/border control;
  - c. Rural education and telehealth services;
  - d. Disaster recovery and emergency response; and
  - e. Critical redundancy or backup connectivity.

- 51. The current Regulations do allow for Satellite TV and VSAT end-user terminals to be registered to a particular end-user. Given, this, the PUC holds the view that the present regulatory framework can be utilized to allow the importation/registration and normalization of any existing SBL end-user terminals in Belize without the need to grant a Class Licence to the Applicant.
- **52.** Recognizing the dynamic nature of this sector, the regulatory framework for satellite end-user terminals can be revisited as necessary to incorporate lessons learned and optimize its effectiveness in achieving regulatory objectives.
- 53. Given the above, SBL is denied a licence to provide fixed Internet services in Belize; however, the PUC finds favour in a decision taken by the Utility Regulation and Competitive Office in Cayman ("OFREG")<sup>4</sup> in which Starlink is permitted to operate in the following circumstances:
  - a. By major licensees, either individually or as a consortium, to address an underserved or unserved area;
  - b. On vessels or aircraft under the terms associated with the permission to use ESIM according to the PUC; and
  - c. In emergency situations when no other service providers are available, and this has a material impact on ongoing business activities, recovery efforts or education in the aftermath of a natural disaster.
- 54. The PUC intends to work closely with SBL and other Satellite-based providers to develop a licensing framework in the future. In the interim, the PUC, like OFREG, holds the view that it is necessary to develop a regime that would allow for the operation and importation, *on a limited basis*, of satellite-based equipment such as those offered by Starlink.

<sup>&</sup>lt;sup>4</sup> <u>Starlink reaches Cayman shelves https://www.caymancompass.com/2025/01/13/starlink-satellite-terminals-hit-cayman-shelves-but-use-remains-restricted/- but use remains restricted</u>

#### **SUMMARY AND CONCLUSION**

- 55. The PUC therefore makes the following decisions:
  - (a) SBL's application for an ISP Class Licence is denied;
  - (b) SBL's request for Starlink Mobile authorisation for ESIM is approved for Aeronautical & Marine use pursuant to Regulation 8(4);
  - (c) SBL's ESIM request for Terrestrial use is not approved;
- 56. Notwithstanding the PUC's Decision, end-users will be allowed to import and operate Starlink's fixed broadband services and this will be treated under the VSAT category pursuant to 8(4) of the Regulations.
- 57. Within Sixty (60) days of making of this Decision, owners of all nomadic and non-nomadic SBL user terminals, operating within the territory of Belize, shall register their use with the Commission.
- **58.** Any future request for the importation of satellite-based terminals will be evaluated on a case-by-case basis and subject to a rigorous importation process.

MADE by the Public Utilities Commission this 20th day of January, 2025

Chairperson

Public Utilities Commission

#### SCHEDULE 1 PUBLIC NOTICES

The Applicant's Public Notices in two local newspapers dated Sunday, October 13, 2024 in The Reporter and Friday, October 11, 2024 the Amandala Belize



## APPLICATION FOR A TELECOMMUNICATIONS LICENCE NOTICE

The Starlink Belize, LLC of Belize city hereby informs the public that pursuant to the Telecommunications (Licensing Classification, Authorisation, and Fee Structure) Regulations, 2020, as amended from time to time, has applied to the Public Utilities Commission (PUC) for the GRANT of a Class License to provide Internet Service in the entire territory of Belize.

Interested parties are invited to submit comments or objections on this application within two (2) weeks of this publication. Comments or objections are to be emailed to telecom@puc.bz.

#### Viewing of Application for the Telecommunications License:

Members of the public and all other interested parties may view the application along with associated information at the offices of the Public Utilities Commission or at the offices of **Starlink Belize**, **LLC** at 56 Daly Street, Belize City, Belize District, Belize.



## APPLICATION FOR A TELECOMMUNICATIONS LICENCE NOTICE

The Starlink Belize, LLC of Belize city hereby informs the public that pursuant to the Telecommunications (Licensing Classification, Authorisation, and Fee Structure) Regulations, 2020, as amended from time to time, has applied to the Public Utilities Commission (PUC) for the GRANT of a Class License to provide Internet Service in the entire territory of Belize.

Interested parties are invited to submit comments or objections on this application within two (2) weeks of this publication. Comments or objections are to be emailed to telecom/a/puc.bz.

#### Viewing of Application for the Telecommunications License:

Members of the public and all other interested parties may view the application along with associated information at the offices of the Public Utilities Commission or at the offices of **Starlink Belize**, LLC at 56 Daly Street, Belize City, Belize District, Belize.

## SCHEDULE 2 PUBLIC REPRESENTATIONS, SBL RESPONSES AND PUC COMMENTARY

#### Representations received during the application process

- 1. The PUC received a record number of representations from the public and other stakeholders in the telecommunications industry.
- 2. More than 115 representations were received in support, of which two (2) were subsequently retracted. Very few members of the public voiced opposition to the application.
- 3. In summary, most respondents recognized a need for internet service in unserved areas, followed by underserved areas. There were a few supporters within existing known served areas.
- 4. The PUC received objections from Stakeholders in the telecommunications sector. The Stakeholders consisted of those licensees who are currently providing fixed and mobile voice services, Cable TV broadband internet service providers and from one Wireless Internet Service Provider ("WISP"). The remaining regional WISPs were not signatory to the petition.
- 5. Other opposing parties included members associated with the telecommunications incumbent, such as individual employees, the Belize Communication Workers Union related to Belize Telemedia Limited, as well as other major shareholders, such as the Belize Social Security Board.
- 6. The PUC also received representation from the Ministry of Public Utilities, Logistics, Energy and E-Governance ("MPUELE"). The Minister stated that, "should approval be considered, Starlink's operations in Belize be facilitated through a local agent, ensuring alignment with local industry dynamics and subject to our national tax regime."

- 7. MPUELE's recommendation is therefore there to be a reseller or retailer arrangement and stated further that if a licence is issued to SBL, it would "create an unfair market advantage over existing ISP's who have had to invest heavily in 'on the ground' infrastructure."
- 8. When the PUC asked SBL whether they intended to operate through resellers or retailers in Belize, their response was that "Starlink works with resellers around the world who can integrate our product into their offerings. Resellers have been a great addition to Starlink's offerings as they are able to provide a local touch that is more in tune with a market's needs."
- 9. The PUC also sought further representation from the Stakeholders. In particular, the PUC asked the Stakeholders to identify areas within Belize's territory that currently fall under the category of unserved areas.
- 10. The PUC agrees with the definition of unserved areas provided by the Stakeholders, that is, those geographic areas in Belize where the Stakeholders do not provide telecommunication services or coverage.
- 11. The PUC is not in agreement with the list the Stakeholders provided for identifying unserved areas for two reasons. First, the list does not identify any islands although the PUC is aware of several cayes that have investigated the possibility of importing Starlink for the purposes of providing telecommunications services. Second, given that the stakeholder representation did not include all WISPs, the PUC is certain that certain areas that are listed as unserved, particularly in the Cayo District, were in fact served.
- 12. The PUC challenged the Stakeholders to identify other technical solutions, other than satellite-based technologies, that would address connectivity gaps for challenging unserved areas. In response, the Stakeholders proposed the following solutions:

- a. Deployment of fixed wireless networks, leveraging less capital-intensive infrastructure complemented with existing fibre backhaul;
- b. Partnership with Power Utilities and other public providers, as an example, to provide fibre optic deployment along transmission lines of poles shared by utility providers; and
- c. Hybrid Models where the Stakeholders can utilize existing backhaul capacity to address connectivity in hard-to-reach areas while the GOB engages International Financial Institutions ("IFI") such as the World Bank or International Development Bank for financing.
- 13. In response to 12(a) above, the PUC notes that this is currently being use by the WISP in Belize. There are no impediments imposed by the PUC that would inhibit the continued growth of this model or allow for replication by the non-WISP members of the Stakeholders.
- 14. In response to 12(b) above, the PUC notes that the utilization of utility poles is a common practice and encouraged, subject to commercial agreements with the electrical utility. The joint use of equipment can be provided for pursuant to Section 48 of the PUC Act.
- 15. The proposal to utilize the IFI may be feasible provided it forms part of the Policy of the Government of Belize. Such approach is not likely to materialize in a short-term period.
- 16. The Stakeholders responses show lack of short-term or immediate solutions that can assist in attaining the programs identified in Belize's National Digital Agenda, in particular expanding connectivity in Belize. The program objective, in part, seeks to provide a:

"Universal internet access strategy: expand affordable internet connection across Belize partnering with private and public

#### telecommunications providers"5

17. There is then, at minimum, a niche market for advanced satellite-based solution in providing service to the unserved or underserved.

 $<sup>^{5} \</sup>underline{\text{https://www.mpuele.gov.bz/wp-content/uploads/2022/10/NATIONAL-DIGITAL-AGENDA-FINAL.pdf} \\$ 

#### ORDER OF THE COMMISSION

#### BELIZE

ORDER made by the Public Utilities Commission (hereinafter referred to as "the Commission") in exercise of the powers conferred upon it by the Public Utilities Commission Act, Chapter 223 of the Laws of Belize, the Telecommunications Act, Chapter 229 of the Laws of Belize, the Telecommunications (Licensing Classification, Authorisation and Fee Structure) Regulations 2024 as amended, and all other powers thereunto the Commission enabling.

**Short title.** 1. This Order may be cited as the:

#### OPERATION AND IMPORTATION OF STARLINK AND OTHER SATELLITE-BASED EQUIPMENT ORDER, 2025 (No. 1 of 2025)

#### **Decisions** and Orders.

- 2. The Commission HEREBY makes an Order as follows:
  - (a) That on or before sixty (60) days from this Decision, users operating Starlink or other satellite-based terminals in Belize must register their terminals with the PUC;
  - (b) Potential Users of Starlink or other such satellite-based terminals may import and operate such equipment with approval from the PUC in the following limited circumstances:
    - i. Unserved or Underserved Areas: end-users will be permitted to import and operate terminals at fixed locations that are currently unserved or underserved by existing internet providers.
    - Vessels and Aircraft: end-users will be permitted to import and ii. operate terminals on vessels and/or aircrafts under the terms and conditions set forth for Earth Station in Motion (ESIM) usage, in accordance with existing regulations.
    - Emergency Situations: end-users will be permitted to import and iii. operate terminals in the event of a natural disaster, and when other service providers are unable to provide emergency services.
  - (c) Where users or potential users fail to comply with this Order, the PUC shall activate enforcement proceedings, leading to the confiscation of such equipment.

#### Amendment

4. This Order may be amended at any time subject to the provisions of the Public Utilities Commission Act and the Belize Telecommunications Act, as amended.

MADE by the Public Utilities Commission this 20th day of January, 2025

Chairperson, Public Utilities Commiss