

**Before the
NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION
Washington, DC 20230**

In the Matter of)	
)	
Telecommunications/ICT Development)	Docket No. 210503-0097
Activities, Priorities and Policies To)	
Connect the Unconnected Worldwide in)	
Light of the 2021 International)	
Telecommunication Union (ITU) World)	RIN 0660-XC050
Telecommunication Development)	
Conference (WTDC-21))	

COMMENTS OF AST SPACEMOBILE, INC.

AST SpaceMobile, Inc. (“AST”) is pleased to submit these comments in response to the above-referenced Request for Public Comment (“Request”) issued by the National Telecommunications and Information Administration (“NTIA”) regarding priorities for the United States as it prepares for the International Telecommunication Union (“ITU”) World Telecommunication Development Conference (“WTDC-21”).

The purpose of the Request is to gather recommendations for U.S. government priorities related to telecommunications/ICT development worldwide. AST applauds NTIA’s efforts to develop a broad record on this issue. The United States’ policy positions should focus on encouraging technology neutral approaches to regulation to connect the unconnected worldwide, including by the use of direct-to-handset satellite services.

I. BACKGROUND: CONNECTING THE UNCONNECTED VIA DIRECT TO HANDSET SATELLITE BROADBAND.

Established in 2017, AST is a U.S. company headquartered in Midland, Texas, where AST is building the first, and only, space-based cellular broadband network to operate directly with standard, unmodified mobile devices. AST’s team of engineers and space scientists, with strategic partners including Vodafone, Rakuten, and American Tower, are on a mission to eliminate the

connectivity gaps faced by today's five billion mobile subscribers worldwide. AST is in the process of building the SpaceMobile Low Earth Orbit ("LEO") satellite constellation, consisting of more than 200 LEO satellites, to finally bring broadband to those who remain unconnected.

Recently, AST became a publicly traded company listed on the NASDAQ exchange under the symbol "ASTS." The proceeds from the initial closing will be used to fund phase one of the commercial launch of AST's space assets. Backed by an extensive IP and patent portfolio, AST will uniquely address the \$1 trillion global mobile wireless services market by delivering seamless broadband cellular connectivity directly to unmodified, existing mobile phones, without any need for specialized hardware. With an expected initial access to 1.3 billion subscribers of some of the world's largest cellular operators, AST will be positioned to rapidly scale its revenue streams as it deploys its space assets for nearly complete global coverage, while benefitting from operating leverage and low maintenance capital costs through its super-wholesale, business-to-business model. Once deployed, AST's services will meet the needs of at least five billion mobile subscribers who face broadband connectivity issues when moving in and out of cellular coverage, and will enable access by more than half of the world population that do not have internet on their phone.

II. THE U.S. REGULATORY FRAMEWORKS NEED TO BE SUPPORTIVE OF KEY POLICY AIMS.

The NTIA seeks comment on what WTDC-21 outcomes would best help achieve the Conference's goal to connect the unconnected and to help raise awareness and mobilize resources to close the digital divide. A successful regulatory framework will allow end users to access affordable mobile broadband without government investment by enabling an encouraging investment environment for the private sector. An important aspect of this is to ensure that policies supported by the U.S. are technology neutral, supportive of all forms of ICT services.

The U.S. should continue to take the lead in the rollout of 5G services. In this regard, the benefits of new satellite technologies are numerous and wide. AST's SpaceMobile system will deliver mobile broadband capabilities to MNOs to meet coverage gaps and deliver 100% population coverage, thereby aiding in closing the digital divide without requiring buildout of terrestrial infrastructure. A technology neutral approach to regulation to meet the policy goals of connecting the unconnected, reducing the digital divide, and addressing the gender gap is vital to ensuring worldwide access to affordable broadband. AST's solution of offering direct to mobile satellite services under the auspices of regional MNOs should be viewed as an important means of achieving these goals. Such a solution builds on the continued success of the mobile industry.

Finally, AST fully supports US leadership in the ITU-D sector focusing on connectivity, such as by capacity building, enabling policy environments to foster adoption of new technology, and promoting new business models and forms of partnership to connect the unconnected with affordable broadband services.

III. CONCLUSION

AST appreciates the opportunity to comment on the U.S. position for the World Telecommunication Development Conference ("WTDC-21), and looks forward to continued engagement in the process.

Respectfully submitted,

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