



6 January 2025

To: **Australian Communications and Media Authority (ACMA)**

Subject: **Plan-S response to the ACMA's consultation paper on the remaking the space object determinations and space object class license**

Dear Sir or Madam,

On behalf of Plan-S Satellite and Space Technologies Inc. (Plan-S), we extend our sincere gratitude for the opportunity to contribute to ACMA's Consultation Paper on the Remaking of the Space Object Determinations and Space Object Class License. We also would like to express our appreciation and support for the proposed inclusion of three additional satellite operators, including Plan-S, in the Radiocommunications (Foreign Space Objects) Determination 2025 (FSOD 2025).

Plan-S is committed to addressing global coverage challenges and fostering a sustainable future for the IoT ecosystem, with the goal of improving life on our planet through sustainable space technologies. Our cutting-edge solution, optimized for massive narrowband IoT connectivity, offers unparalleled cost efficiency, high reliability, high capacity, low latency, comprehensive global coverage, and industry-leading technology solutions based on LoRaWAN and 3GPP standards. Currently, our four operational satellites can provide IoT services across the entire Australian territory. The launch of 12 additional satellites in 2025, already secured through launch agreements, will further enhance service quality by reducing the average revisit time to under 90 minutes.

The inclusion of Plan-S in FSOD 2025 will enable us to deliver advanced IoT solutions to Australia, supporting national priorities such as bridging the digital divide, driving innovation and competition, and advancing sustainability to achieve net-zero emissions by 2050. This inclusion will also allow us to transform sectors such as agriculture, energy, logistics, public safety, and environmental management through precision farming and IoT-enabled resource optimization. Furthermore, enhanced competition in the satellite IoT market will lead to more affordable and accessible connectivity solutions, ultimately contributing to the social and economic prosperity of Australia.

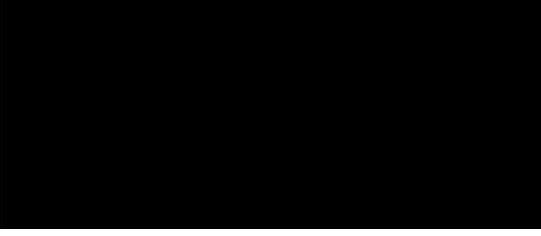
We commend ACMA for its leadership in promoting efficient spectrum utilization, innovation, and digital transformation. These efforts are pivotal in advancing Australia's economic and technological landscape.



Plan-S remains ready to collaborate with ACMA to ensure alignment with regulatory requirements and to contribute significantly to Australia's connectivity landscape, supporting the nation's commitment to innovation, sustainability, and digital transformation.

We remain at your full disposal for any questions

Respectfully submitted,



Özdemir GÜMÜŞAY  
CTO