



The Science and Strategy Behind D2C

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Contenders





SpaceMobile Network

Building the first and only **space-based** cellular broadband network.

AST SpaceMobile and our global partners are building the first and only space-based cellular broadband network to be accessible by standard smartphones. Called SpaceMobile, this ultra-powerful network is being designed to provide connectivity at 4G/5G speeds everywhere on the planet – on land, at sea and in flight. STARLINK

STARLINK DIRECT TO CELL

LEARN MORE



UBIQUITOUS COVERAGE

Starlink satellites with Direct to Cell capabilities enable ubiquitous access to texting, calling, and browsing wherever you may be on land, lakes, or coastal waters. Direct to Cell will also connect IoT devices with common LTE standards.

LEO Broadband





Optical Inter-Satellite Link 2+ Gbps



Satellite-to-User-Termi nal Links 100+ Mbps



POP-to-Gateway Link (Fiber)

Point of Presence

Q

020

Satellite-to-Gatew ay Link 20+ Gbps

6G Backhaul Link 400+ Mbps

Terrestrial 5G/6G Link





Direct-to-Handset Link 0.1-20 Mbps

UT-to-Handset Link





AST SpaceMobile



Space deployment allows for enormous arrays even at sub-GHz frequencies. Bluewalker 3 satellite focuses dozens of \sim 3-deg. beams on surface to support direct-to-handset comms.





NEXT-GENERATION BLUEBIRD



Source: FCC Mobile LTE coverage map



Case Study



Bluebird Block II 220 m² phased array 2500 independent beams 40-MHz bandwidth 3 bps/Hz spectral efficiency 120 Mbps total rate (max) 20-km beam footprint
Rural: 30 people/km²
50% smartphone ownership
~4000 smartphones in footprint
5% peak concurrency
200 peak active users
600 kbps/user



Bluebird Block II 220 m² phased array 2500 independent beams 40 MHz bandwidth 3 bps/Hz spectral efficiency 120 Mbps total rate (max)

Starlink's D2C footprint is *larger* and its bandwidth (from T-Mobile) is only 10 MHz, so *even lower* potential data rate per user.

20-km beam footprint Rural: 30 people/km² 50% smartphone ownership ~4000 smartphones in footprint 5% peak concurrency 200 peak active users 600 kbps/user Starlink's and AST's D2C offerings as planned will not be "broadband" except in special cases where the whole available bandwidth is devoted to a few customers.

Q:What could we change to get true broadband D2C to many simultaneous customers?

Design Space & & Constraints









Constraint: FCC/ITU rules. Power delivered to ground cannot cause harmful interference to adjacent bands.

The back side of AST's phased array is covered in solar panels. >50 kW possible.



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Unlike terminals, handsets are non-directional, so are susceptible to interference from any direction.

Before the Federal Communications Commission Washington, D.C. 20554

In 2024, SpaceX requested a waiver to transmit at 9.4 dB higher power than the SCS framework allows.

AT&T and Verizon fought back, citing harmful interference.

In March 2025, the FCC granted SpaceX's waiver request.

In the Matter of

Space Bureau and Wireless Telecommunications Bureau Seek Comment on Filings of SpaceX and T-Mobile Requesting to Establish Supplemental Coverage from Space

Application for Authority for Modification of the SpaceX NGSO Satellite System to Add a Direct to Cellular System GN Docket No. 23-135; ICFS File Nos. SAT-MOD-20230207-00021, SAT-AMD-20240322-00061

Call Sign: S3069

ORDER

Adopted: March 7, 2025

Released: March 7, 2025

By the Chief, Space Bureau, and the Acting Chief, Wireless Telecommunications Bureau:

I. INTRODUCTION

1. By this Order, the Space Bureau and Wireless Telecommunications Bureau conditionally grant the request of Space Exploration Technologies Corp. (SpaceX) for waiver of section 25.202(k)(1) of the Commission's rules, thereby permitting aggregate out-of-band emissions (OOBE) in the United States at a power flux density (PFD) level up to -110.6 dBW/m²/MHz.¹ SpaceX asserts that the public interest is supported by allowing a waiver of the established PFD to this level, which "will protect adjacent band networks from harmful interference while ensuring that consumers and first responders can use an increasingly robust set of features even in the most challenging circumstances," and will avoid placing artificial caps on the number of satellites used to provide supplemental coverage from space for terrestrial networks.² For the reasons discussed below, we find that there is good cause to grant SpaceX's waiver request, subject to the conditions outlined herein, including requiring that SpaceX address any harmful interference to adjacent band terrestrial wireless networks or else cease operations under the waiver.

II. BACKGROUND

2. In March 2024, the Commission issued the Single Network Future: Supplemental





Uvalde



Space deployment allows for enormous arrays even at sub-GHz frequencies. Bluewalker 3 satellite focuses dozens of \sim 3-deg. beams on surface to support direct-to-handset comms.

Constraint: Launch fairing volume. The largest conceivable phased array over next ~10 years could only be ~16x the area of the Bluebird Block II.



x16 size

Snyder Abilene Brownwood San Angelo

Area of beam footprint scales inversely as the antenna area.

5-km beam footprint
Rural: 30 people/km²
50% smartphone ownership
5% peak concurrency
9.2 Mbps/user

Killeer

an Marc

w Braunfels

San Antonio

Naco



Constraint: Shannon limit. For a given power flux density on ground, there is a maximum channel capacity in bps/Hz. AST is already near this limit.



Gain of phone antenna limited by size/wavelength.



Mobile Satellite Services (MSS) spectrum Fixed Satellite Services (FSS) spectrum Terrestrial cellular spectrum (under SCS)

Mobile Satellite Services (MSS) spectrum

Fixed Satellite Services (FSS) spectrum

Terrestrial cellular spectrum (under SCS)

L Band Allocations – U.S.

Constraint: Most already allocated to credible users.



* Currently under regulatory and legal scrutiny.

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-- Represents shared spectrum

-- Represents terrestrial use spectrum

Source: Company Filings, Press Release, Summit Ridge Group, LLC and TMF Associates, Inc. analysis

Upper L Band, 2 GHz and S- Band Allocations – U.S.



-- Represents shared spectrum

Constraint: Most already allocated to credible users.



-- Represents potential D2D spectrum

Source: Company Filings, Press Release, Summit Ridge Group, LLC and TMF Associates, Inc. analysis

Mobile Satellite Services (MSS) spectrum

Fixed Satellite Services (FSS) spectrum

Terrestrial cellular spectrum (under SCS)

Constraint: Ku and Ka band spectrum sharing depends on user equipment directivity; otherwise not workable.



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Mobile Satellite Services (MSS) spectrum

Fixed Satellite Services (FSS) spectrum

Terrestrial cellular spectrum (under SCS)

Q: Set aside terrestrial spectrum exclusively for D2C, or dual-purpose it for both terrestrial network and D2C?



T-Mobile + SpaceX approach: exclusive set-aside

Point of Presence

But other mobile network operators are extremely reluctant to follow T-Mobile in setting aside their precious terrestrial spectrum for exclusive D2C use.

Killeer ustin Dual use of *same* spectrum for terrestrial network and D2C. Will this work? Is the coordination problem solvable even assuming FDD for both? Can *seamless* coverage be achieved?

Dallas

Waxahachie

orsican

Static

Arlington

Weatherford Fort Worth



Constraint: Multi-satellite MIMO into an omni-directional antenna would require carrier-phase-level alignment between the satellites. *Is this possible*?



Conclusions



D2C will only exceed 3G rates (~3 Mbps) under special circumstances, but will nonetheless be revolutionary.



Much can be done with 3 Mbps!

