LatAm TMT

Could SpaceX Replicate Its US Wireless Strategy In Brazil?

Equities

Latin America

Leonardo Olmos, CFA
Analyst
leonardo.olmos@ubs.com
+55-11-9658 7533

Gustavo Farias
Associate Analyst
gustavo.farias@ubs.com
+55-11-2767 6154

Yesterday's Announcement Raises A New Question For Brazilian Telecom Investors

Yesterday (Oct 8), SpaceX announced the acquisition of another low-band spectrum portfolio in the United States, while AT&T, Verizon and T-Mobile shares fell roughly 6%-8% following the announcement. The transaction adds 14 MHz of 800 MHz spectrum to SpaceX's wireless portfolio and follows the company's pending acquisitions of additional terrestrial spectrum assets from EchoStar.

Key Takeaways:

- We estimate Brazil is one of Starlink's largest markets globally and among its three largest markets worldwide, making it a relevant case study for assessing the portability of SpaceX's emerging U.S. wireless strategy.
- We believe SpaceX could acquire terrestrial spectrum directly from Anatel if it chose to participate in future auctions.
- The 850 MHz process is the most relevant spectrum item to monitor, as it would represent the closest Brazilian equivalent to the recently acquired U.S. 800 MHz assets.
- We find substantial evidence that SpaceX is pursuing mobile connectivity in Brazil through D2D and satellite-spectrum initiatives.
- We do not find evidence that SpaceX has decided to replicate in Brazil the broader wireless model currently being assembled in the United States.

Why Brazil?

We estimate Brazil is one of Starlink's largest markets globally and likely among its three largest markets worldwide. If SpaceX eventually extends its emerging U.S. wireless strategy abroad, Brazil is one of the most relevant markets to monitor.

The starting point is understanding what SpaceX is trying to build in the U.S.

According to our colleague John Hodulik, the recently acquired 800 MHz spectrum should not be viewed as a standalone asset. SpaceX already has a dedicated mobile constellation, D2D capabilities, pending EchoStar spectrum acquisitions and FCC approval for its Gen2 Starlink Mobile constellation. The strategic importance of the 800 MHz portfolio is that it provides the low-band coverage layer needed to address locations where satellite-only connectivity remains less effective, including dense urban environments and indoor locations.

Importantly, the U.S. debate is no longer centered on D2D alone

The more relevant question is whether SpaceX can gradually assemble the components required for a more complete wireless platform, combining satellite assets, spectrum assets and eventually terrestrial infrastructure. That framework provides a useful starting point for analyzing Brazil.

UBS

This report has been prepared by UBS BB Corretora de Câmbio, Títulos e Valores Mobiliários S.A.. **ANALYST CERTIFICATION AND REQUIRED DISCLOSURES, INCLUDING INFORMATION ON THE QUANTITATIVE RESEARCH REVIEW PUBLISHED BY UBS, BEGIN ON PAGE 7.**

Figure 1: Which Pieces of the U.S. Wireless Playbook Already Exist in Brazil?

	Building Block	United States	Brazil	Why It Matters
1	**Mobile satellite constellation**	In place	In place	Global Starlink asset supporting direct-to-device services
2	**D2D capability**	In place	Emerging	Enables direct connectivity between satellites and standard mobile devices
3	**Mobile satellite spectrum**	In place	Emerging	Brazil's S-band process could support voice, messaging and broadband D2D services
4	**Low-band terrestrial spectrum**	In place	Not in place	The recently acquired 800 MHz spectrum provides **coverage** and better indoor propagation in the U.S.; 850 MHz is the closest potential Brazilian parallel
5	**Mid/high-band terrestrial spectrum**	Being assembled	Not in place	EchoStar spectrum provides a **capacity layer** in the U.S.; no equivalent Brazilian portfolio has been identified
6	**Terrestrial infrastructure**	Emerging	No evidence identified	Towers and RAN remain necessary to serve dense locations and building interiors reliably
7	**Integrated mobile operator model**	Emerging	No evidence identified	Operating as a full mobile competitor requires the previous building blocks to work together

Brazil already has the satellite and emerging D2D layers. The missing pieces are terrestrial low-band and capacity spectrum, terrestrial infrastructure and an integrated mobile operating model.

Source: UBS Research; FCC orders and approvals relating to Starlink Mobile; Anatel public consultations and regulatory proceedings. Note: Figure reflects UBS interpretation of publicly available regulatory developments as of 9 October 2026.

Could SpaceX Acquire Terrestrial Spectrum Directly From Anatel?

We believe the answer is yes. We found no obvious regulatory barrier that would prevent SpaceX from participating in future spectrum auctions through a Brazilian legal entity, subject to the same qualification requirements imposed on other participants. The company would not necessarily need to acquire spectrum from Vivo, TIM or Claro to obtain terrestrial frequencies.

Why Does 850 MHz Matter?

The answer comes directly from the U.S. debate. According to our colleague John Hodulik, the strategic value of the recently acquired 800 MHz spectrum is not simply that it increases SpaceX's spectrum holdings. Its importance comes from the propagation characteristics of low-band spectrum, which improve coverage and indoor penetration in locations where satellite-only connectivity faces limitations.

- **Could 850 MHz play a similar role in Brazil?** We think so. If SpaceX ever sought to build a hybrid wireless architecture in Brazil, 850 MHz would likely represent the closest equivalent to the role played by the newly acquired 800 MHz spectrum in the United States.
- **Is 850 MHz Enough?** No. This is where the comparison with the U.S. becomes important. The recent 800 MHz acquisition should not be viewed as a standalone event. In the United States, SpaceX is simultaneously assembling multiple spectrum layers. In addition to low-band spectrum, the company is also acquiring AWS-3, AWS-4 and H-Block frequencies through the pending EchoStar transactions. Together, those assets provide both coverage spectrum and capacity spectrum.

Figure 2: Potential Spectrum Paths For SpaceX In Brazil

Band	Regulatory Status	Strategic Relevance
S-Band (2 GHz)	Ongoing process	Supports D2D and satellite-based mobile services
700 MHz	Recently allocated	Limited immediate relevance
850 MHz	Active regulatory discussion	Closest parallel to recent U.S. strategy
900 MHz	Longer-term roadmap item	Potential future opportunity

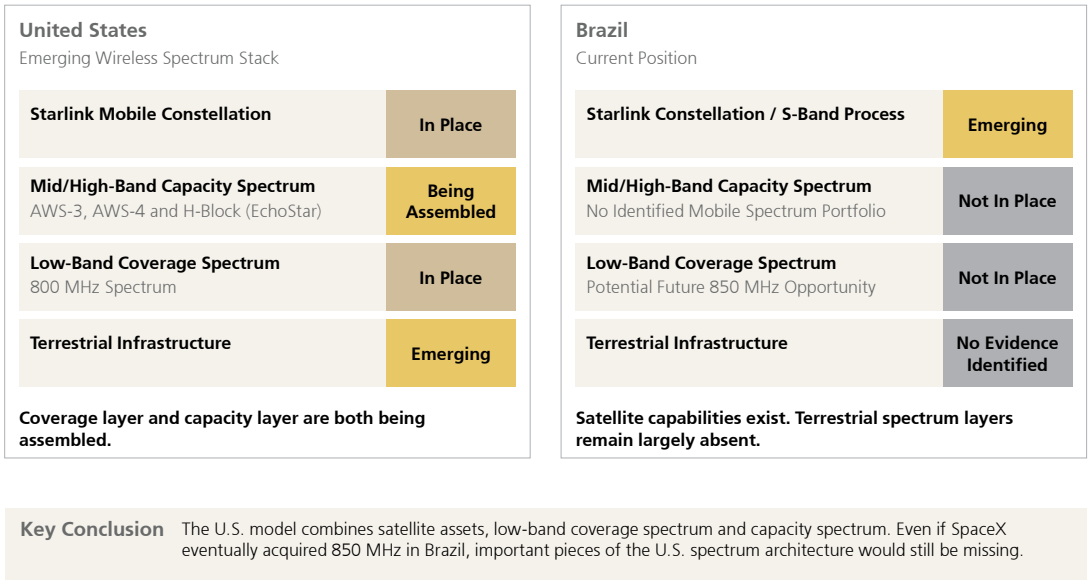
Source: UBS Research; Anatel spectrum planning documents, regulatory agenda and public consultations. Note: Regulatory timelines reflect currently published Anatel planning documents and may change. Availability of spectrum does not imply SpaceX interest or participation.

Brazil currently looks very different

A future 850 MHz position could address part of the coverage question. However, we have not identified an equivalent path to a broader terrestrial mobile spectrum portfolio similar to the assets SpaceX is accumulating in the United States. Even under a scenario where the company successfully acquires low-band spectrum in Brazil, additional spectrum assets would likely still be required to replicate the broader U.S. architecture.

- That distinction is important because the emerging U.S. model is increasingly based on a combination of low-band coverage assets and mid/high-band capacity assets, rather than on a single spectrum acquisition.

Figure 3: Spectrum Portfolio: U.S. Versus Brazil



Source: UBS Research; FCC filings and approvals; Anatel regulatory proceedings. Note: U.S. spectrum portfolio based on announced and pending transactions. Brazilian spectrum portfolio reflects spectrum assets and regulatory processes identified as of 9 October 2026.

What Has SpaceX Actually Said About Brazil?

The distinction between what SpaceX has done and what investors assume it might do is important. We found substantial evidence that SpaceX is pursuing mobile connectivity opportunities in Brazil. SpaceX has requested additional S-band rights in Brazil, has discussed voice, messaging and broadband direct-to-device services with regulators, and has maintained a dedicated regulatory effort around Starlink Mobile. The company has also indicated that it obtained the authorizations required to initiate D2D services in Brazil using spectrum from a local mobile operator partner.

- **What does that tell us?** The evidence suggests SpaceX is expanding beyond broadband services in Brazil and investing regulatory resources to pursue mobile connectivity opportunities.



Does SpaceX Need To Build Its Own Network To Enter Mobile?

No. The evidence we found points first toward a partnership-based approach. Regulatory filings and industry reporting indicate that SpaceX has already pursued arrangements involving spectrum licensed to a Brazilian mobile operator. Discussions involving Vivo have also been reported repeatedly in the local telecom press. Taken together, the currently documented path resembles the original Starlink-T-Mobile model more closely than the more recent U.S. strategy of accumulating terrestrial spectrum assets.

- That does not mean partnerships are the company's only option. It simply means partnerships are where the evidence currently points.

Has SpaceX Taken Steps Toward Replicating The U.S. Model?

We found no identified evidence that SpaceX has:

- expressed interest in a future 850 MHz auction.
- applied for terrestrial mobile spectrum.
- announced terrestrial RAN deployment plans.
- stated an intention to compete directly with Vivo, TIM or Claro.

The distinction matters because the evidence for D2D is strong, while the evidence for a broader terrestrial mobile strategy remains limited.

Figure 4: What We Know Versus What We Infer

Question	Evidence Found	Our Interpretation
Is SpaceX pursuing mobile services in Brazil?	Yes	High confidence
Is SpaceX pursuing D2D services?	Yes	High confidence
Is SpaceX working with local operators?	Evidence suggests yes	Most likely near-term model
Is SpaceX pursuing terrestrial low-band spectrum?	No direct evidence identified	Open question
Is SpaceX pursuing terrestrial infrastructure?	No direct evidence identified	Open question
Is SpaceX pursuing a fourth mobile network strategy?	No direct evidence identified	Possible future scenario, not current evidence

Source: UBS Research; Anatel filings; FCC filings; company statements; Brazilian telecom press reporting. Important: Questions are assessed based on publicly available evidence reviewed by UBS Research as of 9 October 2026. Absence of evidence should not be interpreted as evidence of absence.

What Should Investors Monitor Next?

The main question is not whether D2D is coming to Brazil. The evidence increasingly suggests it is. The more important question is whether SpaceX begins pursuing the additional building blocks that characterize its emerging U.S. wireless strategy. The clearest signals would be:

- Participation in future low-band spectrum processes, particularly 850 MHz.
- Acquisition of terrestrial mobile spectrum assets.
- Evidence of terrestrial infrastructure deployment.
- Regulatory actions consistent with a broader wireless strategy.

Today, we find clear evidence that SpaceX is pursuing mobile connectivity opportunities in Brazil. We also find a regulatory path through which the company could eventually acquire terrestrial spectrum if it chose to do so. What we do not find today is evidence that SpaceX has decided to replicate in Brazil the broader wireless model it is assembling in the United States.