Starlink and the Middle East: Legal Horizons for Satellite Internet

I. Introduction

What happens when the internet stops depending on cables and towers, and starts coming from the sky? As Starlink's low Earth orbit (LEO) satellites beam high-speed internet across deserts, seas, and remote villages, Middle Eastern regulators are facing a legal frontier they have never navigated before. This is not just about faster connectivity; it's about sovereignty, cybersecurity, data flows, and how nations assert control when the infrastructure operates in orbit. Qatar, the UAE, and Saudi Arabia are all rewriting the rules in real time, figuring out how to license, regulate, and partner with global tech giants like SpaceX.

For governments and investors alike, the emergence of satellite internet is no longer a futuristic concept.

II. Licensing Requirements under Telecom Laws

Regulators across the Middle East generally treat satellite internet providers such as Starlink as telecommunications service operators, requiring them to obtain formal licences before providing services. Each country's telecom law establishes distinct licensing frameworks that reflect national priorities, regulatory philosophies, and approaches to market entry.

Licensing Year: 2022

Scope of License: Residential/Commercial

Duration: 25 years

Local Entity Name: Starlink Satellite Qatar W.L.L.

Regulator: TDRA

Licensing Year: 2024

Scope of License: Maritime

Duration: 10 years

Local Entity Name: Starlink Services L.L.C

Regulator: CST

Licensing Year: 2025

Scope of License: Aviation/Maritime/Broader

Duration: TBD

Local Entity Name: Starlink KSA

Qatar

Qatar stands out as one of the earliest adopters of satellite internet regulation. In September 2022, the Ministry of Communications and Information Technology granted an Individual Licence to Starlink's local entity and Starlink Satellite Qatar W.L.L.. This license authorises the company to operate public satellite telecommunications networks and services.[1] This 25-year licence, issued after a public consultation on draft terms, permits Starlink to serve both residential and commercial customers.[2] As a result, Starlink is now recognised as a fully licensed telecommunications provider in Qatar.

United Arab Emirates

In contrast, the United Arab Emirates (UAE) has adopted a phased regulatory approach. In 2024, the Telecommunications and Digital Government Regulatory Authority (TDRA) issued Starlink a 10-year licence limited to maritime satellite internet services.[3] The authorisation allows connectivity for ships, yachts, and offshore platforms within UAE territorial waters but does not yet extend to home or business use on the mainland. Starlink's official coverage map still marks the UAE mainland as 'pending regulatory approval,' reflecting the TDRA's structured deployment strategy.

1. Communications Regulatory Authority (CRA), 'CRA Issues a Telecommunications License to Starlink Satellite Qatar' (3 October 2022) https://www.cra.gov.qa/en/Press-Releases/CRA-Issues-a-Telecommunications-License-to-Starlink-Satellite-Qatar

2. DataCenterDynamics, 'Starlink secures license in Qatar' (3 October 2022) https://www.datacenterdynamics.com/en/news/starlink-secures-license-in-qatar/

3. The National, 'New regulations could see Musk's Starlink finally come to UAE' (13 August 2025) https://www.thenationalnews.com/future/2025/08/14/starlink-uae-musk-internet-services/

Saudi Arabia

Saudi Arabia licensed Starlink in May 2025, when the Communications, Space and Technology Commission (CST) approved the company's operations across the Kingdom.[4] Early reports indicated that authorisation might initially focus on aviation and maritime connectivity.

Later reporting suggested the licence may expand to broader broadband services, although CST has not publicly released full details. This policy shift aligns with the goals of Vision 2030, emphasising digital infrastructure expansion and connectivity in underserved areas. For Saudi regulators, satellite internet represents a useful tool for extending service availability across rural and remote communities.

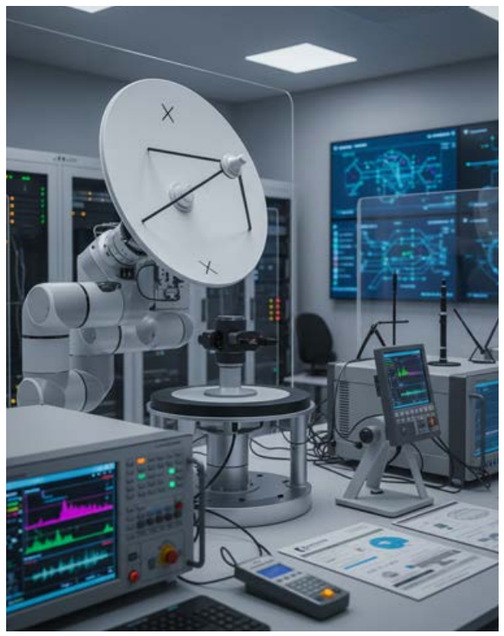
Regional Commonalities and Localisation

Despite differences in timing and scope, all three jurisdictions, require Starlink to maintain a localised legal presence. Each country hosts a national Starlink entity, Starlink Satellite Qatar W.L.L., Starlink Services L.L.C. (UAE), and Starlink KSA (Saudi Arabia). These subsidiaries act as licence holders and operational anchors, ensuring compliance with domestic law.[5] Local incorporation also facilitates fiscal accountability (including licence fees and revenue sharing) and enables the enforcement of ownership and control requirements where applicable.

Regulatory Obligations and Comparative Context

Licensing in the Gulf extends beyond formal registration. All three countries impose detailed technical, commercial, and regulatory obligations, including spectrum authorisation, equipment type approval, consumer protection rules, tariff transparency, and quality-of-service standards. Qatar's Individual Licence imposes the most comprehensive set of duties, equivalent to those applied to terrestrial telecom operators.

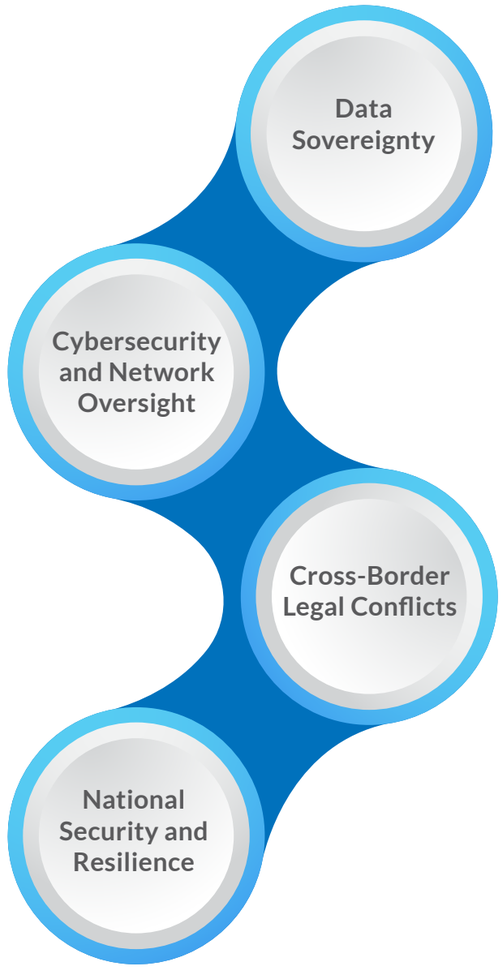
By contrast, other jurisdictions, such as Jordan, have granted Starlink only a class licence. This illustrates the variation in how Middle Eastern regulators categorise and supervise satellite broadband providers.



4. Gulf News, 'Saudi Arabia approves SpaceX's Starlink for aviation and maritime shipping, expanding connectivity' (15 May 2025) https://gulfnews.com/world/gulf/saudi/saudi-arabia-approves-spacexs-starlink-for-aviation-and-maritime-shipping-expanding-connectivity-1.500128233
5. Stimson, 'GCC Welcomes Starlink but Limits its Reach' (5 August 2025) https://www.stimson.org/2025/gcc-welcomes-starlink-but-limits-its-reach/

III. Cross-Border Data Flows and Cybersecurity Implications

Starlink's low Earth orbit (LEO) satellite collection enables direct communication between user terminals and orbiting satellites, raising complex issues around data sovereignty, cybersecurity, and cross-border regulation. Unlike traditional internet traffic that typically remains within on land networks, Starlink's system can beam data across national borders.



Data Sovereignty

Governments in the region are increasingly focused on where citizens' data travels and is stored. If a Starlink user in Qatar connects via satellite, the data may route through a foreign gateway if no local ground station exists, potentially placing it outside Qatar's jurisdiction. To maintain control, regulators are prioritizing data localisation and infrastructure sovereignty. For instance, Oman not only licensed Starlink but also took an equity stake in SpaceX through the Oman Investment Authority, reportedly ensuring that Starlink ground stations, and thus Omani data, remain under domestic control. However, no official confirmation exists.[6]

Regulators in Qatar, Saudi Arabia, and the UAE are expected to require Starlink to either build domestic ground stations or agree to route user data through local servers, ensuring that national data remains accessible to local authorities and compliant with domestic data protection frameworks.

Cybersecurity and Network Oversight

Starlink's network architecture bypasses much of the on-land telecom infrastructure. While this enhances resilience, especially during natural disasters or cable outages, it also complicates cybersecurity oversight. Governments are evaluating the implications of encrypted networks that operate outside traditional monitoring systems. Questions arise regarding how such networks would

6. GCC Welcomes Starlink but Limits its Reach (Stimson Center) — on Oman licensing and infrastructure ambitions. https://www.stimson.org/2025/gcc-welcomes-starlink-but-limits-its-reach/

be managed in the event of unauthorised use, including security-related activity.

Middle Eastern regulators are likely embedding cybersecurity conditions into Starlink's licences. These could include mandatory cooperation with national cyber authorities, adherence to government-approved encryption standards, disclosure of network architecture, and periodic security audits. As one analysis notes, private satellite constellations may operate outside national network frameworks, creating regulatory and security oversight considerations. [7]

To mitigate these risks, countries such as Saudi Arabia and the UAE are expected to use licensing mechanisms to establish oversight frameworks, including compliance with national cybersecurity strategies, mandatory incident reporting, and obligations to support countermeasures in the event of cyberattacks on satellite infrastructure.

Cross-Border Legal Conflicts

Starlink's global architecture introduces complex jurisdictional considerations. If data from Middle Eastern users is transmitted through European or U.S. ground stations, it may fall under foreign legal regimes (such as the U.S. CLOUD Act), potentially conflicting with Arab data privacy laws.

These questions remain largely untested. Gulf regulators are increasingly focused on ensuring that citizens' data remains governed by local standards. Future regulatory responses may include rules prohibiting the transmission of sensitive or government-related data through foreign gateways, or requirements that Starlink segregate data regionally.

The Observer Research Foundation has urged Gulf states to establish dedicated data governance policies for satellite internet, aligned with licensing and spectrum regulation.[8] Such frameworks may mandate user consent for cross-border transfers, onshore data storage for account information, or sector-specific data routing standards.

National Security and Resilience

Starlink's entry forces Middle Eastern states to reassess how cybersecurity and data protection laws apply to ISPs operating from space. Increased coordination between telecom regulators, cybersecurity agencies, and defense ministries in Qatar, the UAE, and Saudi Arabia is likely. While satellite connectivity enhances resilience, particularly during undersea cable cuts or terrestrial outages, it also presents potential vulnerabilities, such as signal interception or jamming. Governments view Starlink as both a strategic opportunity and a security challenge.

7. Digital Infrastructure, Strategic Power: The Gulf's Data Centre Boom (ORF) - notes on regional data localisation trends. https://orfme.org/expert-speak/digital-infrastructure-strategic-power-the-gulfs-data-centre-boom/

8. Data localisation and regulation of non-personal data | UAE (Baker McKenzie) - details UAE's regime over non-personal / data residency restrictions. https://resourcehub.bakermckenzie.com/en/resources/global-data-and-cyber-handbook/emea/uae/topics/data-localization-and-regulation-of-non-personal-data

The goal is to harness its redundancy and resilience benefits while maintaining tight oversight of data flows and network operations. [9]

9. Starlink Ground Stations: What They Are and How They Work - technical description of gateway function, bridging satellite to terrestrial internet. https://www.starlinkinfo.com/starlink-ground-stations

IV. National Security and Content Regulation Considerations

National security remains a central concern shaping regulatory decisions on Starlink across the Middle East. Authorities aim to ensure satellite internet services comply with existing security and regulatory frameworks, which are considered important for maintaining national stability and cultural standards. Four key areas dominate this regulatory focus.

Lawful Interception and Surveillance

In every jurisdiction, Starlink's licence includes obligations to enable lawful interception, requiring cooperation with law enforcement and intelligence agencies when legally authorised. For example, Qatar's licence explicitly obliges Starlink to "make available to duly authorised law enforcement agencies… all stored information" upon request and to comply with national security orders.[10] These clauses ensure that even when traffic is routed through satellites, governments can still obtain user data or intercept communications. Implementation may involve decryption capabilities or controlled access feeds under specific conditions. While the texts of the Saudi and UAE licences are not public, it is almost certain that they contain similar requirements. Saudi telecom regulations mandate that licensed operators provide government monitoring capabilities, and the UAE's laws similarly require cooperation on surveillance.

Internet Content Filtering

Middle Eastern states maintain strict internet content controls. Websites or material that violate cultural, religious, or political red lines are systematically blocked at the ISP level.

The UAE's Telecommunications and Digital Government Regulatory Authority (TDRA) obliges all ISPs to filter content related to terrorism, pornography, gambling, and certain political speech, and to block websites on government order.[11] Starlink must comply with the same rules.

Technically, this likely means integrating government-provided blacklists or filtering systems (e.g., DNS or IP blocks) within its local service. Qatar's licence explicitly references "Network Blocking" requirements, mandating Starlink to execute censorship orders from the Communications Regulatory Authority (CRA). The UAE's Internet Access Management Policy imposes identical duties, requiring adherence to detailed categories of prohibited content. Compliance may involve routing traffic through local proxy servers or applying national filters to all registered terminals. Failing to meet filtering obligations could jeopardise Starlink's licence.

10. CRA Issues a Telecommunications License to Starlink Satellite Qatar" (Communications Regulatory Authority, 3 October 2022) https://www.cra.gov.qa/en/Press-Releases/CRA-Issues-a-Telecommunications-License-to-Starlink-Satellite-Qatar

National Security Usage Controls

Authorities are concerned about unauthorised or subversive use of Starlink, especially in politically sensitive contexts. Such terminals can be physically imported without authorisation. Even when imported without authorisation, these terminals can pose regulatory and security challenges, some governments have criminalised unlicensed operation. In some jurisdictions, authorities have temporarily restricted Starlink services pending regulatory evaluation of service implications.

11. "Internet Guidelines – TDRA" (TDRA) https://tdra.gov.ae/en/about/tdra-sectors/information-and-digital-government/policy-and-programs-department/internet-guidelines

Before Starlink's licensing in the UAE, officials similarly warned that importing or using Starlink equipment was illegal. With formal licences now in place, regulators ensure that only registered and authorised terminals operate within national boundaries. Each Starlink kit must likely be registered with the regulator, and records must be available for inspection.

Telecom laws also include emergency powers, enabling authorities to suspend or restrict service during security operations. Starlink's agreements likely require full compliance with such orders. Though not yet publicly tested in Qatar, the UAE, or Saudi Arabia, the precedent has been set.

Content Liability and Local Representation

Governments require every telecom operator to maintain a local legal entity responsible for regulatory compliance. This ensures authorities can enforce sanctions or fines for violations such as failing to block illegal content or provide lawful access to user data. Local subsidiaries of Starlink can therefore be held directly liable under domestic law. This structure guarantees prompt responses to court orders or regulatory directives and ensures Starlink operates under the same accountability regime as local ISPs like Ooredoo, Etisalat, and STC.

Cautious Implementation Across the Region

Several states remain cautious in licensing satellite internet until national security

safeguards are fully tested. Lebanon, for example, approved only a three-month Starlink pilot in late 2023 to assess the technical and security implications before granting full authorisation.[12] This reflects a broader trend in which Middle Eastern governments are integrating technological innovation alongside the development of regulatory safeguards.

V. Role of Regulatory Authorities (CRA, TDRA, CST) in Oversight

Telecom regulators in the Middle East play a critical role in shaping and enforcing the legal framework for satellite internet. While their approaches differ, they all act as gatekeepers, ensuring Starlink operates within national priorities and legal parameters.

Qatar: Transparency and Early Adoption

The Communications Regulatory Authority (CRA), under the Ministry of Communications and IT, was among the first in the region to license Starlink. Beyond granting the licence, the CRA continues to oversee compliance, managing spectrum allocation, handling consumer complaints, and monitoring service quality.

Notably, the CRA conducted a public consultation in 2022 before finalising Starlink's 25-year licence, reflecting a transparent and inclusive approach.[13] It also issues content-blocking and lawful interception orders under licence conditions. Qatar's approach reflects its strategy to support technological development within its national regulatory framework. The CRA is expected to continue refining its telecom bylaws and technical standards to address the growing role of non-terrestrial networks such as LEO collections.

12. "Regulatory approvals for Starlink services in MENA countries" (EICON) (Qatar's license includes blocking obligations) https://www.eicon-me.com/publications/ei_starlink_mena-5_2783.pdf

13. Consultation on the Draft License of "Starlink Satellite Qatar" (CRA, 2022) https://www.cra.gov.qa/en/document/consultation-on-the-draft-license-of-starlink-satellite-qatar

UAE: Phased Regulation and Multi-Agency Coordination

The Telecommunications and Digital Government Regulatory Authority (TDRA) has adopted a phased, cautious approach. Its 2024 maritime-specific licence to Starlink marked the first step in evaluating broader deployment.[14] The TDRA collaborates closely with other entities, including the UAE Cyber Security Council and National Media Council.

The UAE views Starlink as a potential asset for disaster recovery communications and remote oil-field operations, but the TDRA also safeguards market fairness by regulating tariffs, consumer transparency, and equipment standards. It must also authorise the Ku/Ka band spectrum used by Starlink, with technical teams verifying alignment with Emirati standards.[15] Through this integrated oversight, the TDRA is shaping how satellite broadband fits into the UAE's broader digital-infrastructure strategy.

Saudi Arabia: Integration with Space Policy and Vision 2030

In Saudi Arabia, the Communications, Space and Technology Commission (CST), formerly CITC, has expanded its mandate to cover space policy, reflecting its strategic alignment with Vision 2030. The CST's 2025 approval of Starlink marked a milestone in extending digital access across the Kingdom's vast territory.[16] It now oversees Starlink's rollout, including service delivery to remote provinces and the potential establishment of local gateways.

Building on its experience with VSAT and GMPCS licensing, the CST is developing a tailored framework for LEO broadband, imposing obligations such as participation in national connectivity projects and emergency-response networks. A key regulatory focus is coordinating Starlink's market entry with the national telecommunications sector. Before licensing Starlink, STC had conducted its own non-terrestrial network trials, reportedly achieving higher speeds in some bands. CST aims to ensure that Starlink operates in a way that supports national telecommunications objectives, potentially through joint projects in rural clinics or smart-city pilots.

Inter-Agency Coordination and Evolving Frameworks

Regulators across the region coordinate with national security, defence and space authorities to oversee satellite services. In the UAE, the TDRA works with the UAE Space Agency and State Security Authority, while Qatar's CRA consulted security services during Starlink's licensing. Saudi Arabia's CST collaborates with the Ministries of Defence and Interior

14. Satellite Internet Services Licence No (2) of 2024 (TDRA, UAE) https://tdra.gov.ae/-/media/About/regulations-and-ruling/EN/Starlink-License--EN.ashx?t=Starlink+License
15. TDRA Guidelines for Coordination of Satellite Networks (TDRA) https://tdra.gov.ae/-/media/About/regulations-and-ruling/EN/Guidelines-for-Coordination-of-Satellite-Networks--Version-2--pdf.ashx

16. Elon Musk says Saudi Arabia approves use of Starlink (AGBI, May 2025) https://www.agbi.com/space/2025/05/elon-musk-says-saudi-arabia-approves-use-of-starlink/

on security compliance.

Starlink's entry has accelerated the development of new frameworks for LEO satellite regulation, cross-border data routing and competition with terrestrial networks. Bahrain has authorised Starlink in a limited capacity and is moving toward broader regulatory integration.

Implications for Businesses and Investors

For clients and investors, these authorities are far from passive licensors; they act as ongoing compliance partners. Early engagement and transparent communication are critical for successful market entry. Regulators possess broad enforcement powers, including fines and licence suspension for non-compliance. Starlink's cooperation with regulators, evident in partnerships such as with Qatar Airways, reflects a proactive engagement model that other technology and telecom operators would be well advised to mirror.

VI. Why This Matters: A Timely Issue for Governments and Investors

The arrival of Starlink in the Middle East marks a crucial shift for policymakers and investors. Satellite internet is reshaping digital infrastructure and prompting rapid regulatory adaptation. Governments are reassessing telecom policy, as low Earth orbit (LEO) networks operate across borders and challenge traditional jurisdictional models. New regulatory frameworks are being developed to maintain oversight of digital infrastructure.

This evolution is already under way, with regional policymakers drawing on global precedents such as India's strict satellite regime.[17] Starlink's rollout serves as a live test case; how it is managed will shape readiness for future entrants like OneWeb and Amazon's LEO. If handled well, Starlink could advance digital inclusion, extending connectivity to underserved communities and supporting smart infrastructure in remote regions.

17. Ministry of Communications (India), Guidelines for Satellite Communications Services 2023 (Government of India, 2023) https://www.isro.gov.in/media_isro/pdf/satcom-ngp.pdf

Governments in Qatar, the UAE, and Saudi Arabia have embedded digital connectivity into their national visions, linking it to innovation, education, and public service delivery. Satellite internet could enable e-health, IoT (Internet of Things) in agriculture, and emergency communications in isolated areas.[18] Effective regulation aims to balance innovation objectives with security considerations. Regulators must weigh rapid rollout against national safeguards, decisions that will shape regional development for decades.

The UAE's cautious, sector-specific model reflects a risk-managed market entry.[19] Both approaches show how regulatory maturity and risk appetite shape the space-tech investment climate. Investors, whether in ground stations, distribution, or satellite-enabled services, must scrutinise the permissibility of revenue segments, partnership obligations, and profitability under national licence terms.

In Saudi Arabia, STC has trialled non-terrestrial networks, indicating incumbents' intent to defend market share.[20] Legal frameworks will determine how this competition evolves. Strong regulations can ensure fair interconnection and prevent monopolistic practices.

18. GCC Interconnection Authority, Digital Transformation in the GCC: Bridging the Connectivity Gap (2024) https://gccia.com.sa/wp-content/uploads/2024/09/Annual-Report-2023-English-Arabic.pdf
19. The National, New regulations could see Musk's Starlink finally come to UAE (13 August 2025) https://www.thenationalnews.com/future/2025/08/14/starlink-uae-musk-internet-services/
20. Arab News, STC conducts successful non-terrestrial network (NTN) trial ahead of Starlink approval (12 March 2024) https://www.cst.gov.sa/en/about/program-and-initiatives/Non-Terrestrial-Networks-Program

Conclusion

Starlink's expansion across Qatar, the UAE, and Saudi Arabia signals a transformative shift in connectivity, and in how law, technology, and policy intersect. These early regulatory models are not just about Starlink; they are shaping the legal architecture for the next generation of global connectivity. Policymakers and investors who understand these contours will be best placed to harness opportunity while managing risk.