

12/9/2016

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Subject: **Comments / counter-comments to consultation paper on Captive CUG policy issues**

Date: 09/12/16 05:37 PM

To: "advmn@traf.gov.in" <advmn@traf.gov.in>

From: venu gopala V <venu@incois.gov.in>

Cc: "traf.mn@gmail.com" <traf.mn@gmail.com>

Traf-questioner-incois-input.doc (35kB)

Sir,

Please find the attachment on the above subject.

Regards,

V.Venu Gopal Rao,

INCOIS,

Hyderabad.

Reply to the Questioners on the consultation paper no 23/2016 dated on 28 Oct 2016 of TRAI

Sl	TRAI questioners	INCOIS answer/comments
1	Should the license fee for the 2nd VSAT hub, which is used independently or for redundancy purpose be kept same as that of 1st Hub? If no, what should be the per annum fee for the 2nd Hub? Please justify your answer.	<u>Suggested modification in the clause:</u> Like one-time payment of Rs 30Lakhs for the 1st Hub along with Financial Bank Guarantee(FBG) of Rs 30.0Lakhs renewable annually, DoT could charge one-time payment of 16.0Lakhs for the 2nd Hub with Financial Bank Guarantee(FBG) of Rs 16.0 Lakhs renewable every year.
2	Is there a need to review some or all of the fee/charges viz. Entry fee, License Fee, Royalty Charges and Bank Guarantee etc. for Captive VSAT CUG licenses(1st hub and 2nd hub)? If yes, what should be appropriate fee/charges? Give details with justification	DoT order and the WPC calculation are not matching. the WPC charge for the INCOIS case is similar to as given in section 2.11, page 8 of the consultation paper 23/2016 dated 28 Oct 2016. INCOIS network being a star VSAT network, the Royalty charge calculated by WPC similar to DSNG (OB Van) is not applicable.
3	In your opinion what should be the procedure and time frame for issuing various license(s)/approvals and augmentation of bandwidth for captive VSATs? Please give rationale to support your arguments.	<p>In the interest of customer and satellite usage in time, WPC should reduce the processing time and time bound.</p> <p>After the first time approval, the procedure for any addition of VSATs, relocation, bandwidth adjustment within the allocated bandwidth should be simplified. Customer may be allowed to operate these VSATs after obtaining Decision letter with condition that customer shift the location of VSATs on his/her own cost in case of problem of SACFA clearance for those locations.</p> <p>The customer pay spectrum charge after receipt of LoI from WPC. The effective date from which the Royalty charge is calculated. should be taken from the date of Decision Letter or later. However there should be a definite time limit from WPC side for SACFA clearance and Operating license.</p> <p>INCOIS make payment for satellite bandwidth to Antrix/ISRO with invoice. Likewise it is expected that WPC/DoT should give invoice for the advance payment of annual spectrum charge /license, based on the number of VSATs/BW used during the period.</p>

		It is desired that WPC use fast mode of communications like email/fax/phone and the hard copies follows to reduce the communication delays.
4	Is it appropriate to split the captive VSAT categories for (1) Non-profit Government organizations/departments(handling important missions) and (2) Commercial organizations and others? If yes, please suggest Entry fee, License fee, and Royalty charges etc. for the two categories of licenses. Should the rates applicable to such non profit government organizations be at a discounted rate as compared to the rates applicable for other business organizations? Justify your answer.	The charges for Non-profit Government organizations / departments (handling important missions) could be at lower rate than the commercial organizations.
5	Any other Change(s) required in the captive VSAT CUG license terms and conditions? Please justify the suggested change(s)	
5a	Other Points	<p>If the CUG network has both Tx/Rx VSATs and Rx only VSATs</p> <p>(i) If a single Hub uplink carrier and the corresponding remote downlink serves both types of VSATs (Tx/Rx & Rx) and if customer pay the spectrum charge as part of Hub up link/downlink and Remote uplink/downlink for the network, there should not be separate Royalty charge for Rx only VSATs but only spectrum license fee of Rs. 500/- and annual VSAT license fee should be reduced to Rs.2000 from the present Rs.10000</p> <p>(ii) WPC approval procedure should be simplified for the Rx only VSAT. The customer not requiring NOCC approval, they should be permitted to operate the Rx VSATs after getting Lol and payment of spectrum license fee.</p>