

19 January 2022

Telecom Regulatory Authority of India (TRAI)
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg
New Delhi – 110 002
India

Attention: Shri Anil Kumar Bhardwaj, Advisor (B&CS)

Re: Intelsat Comments to TRAI's Consultation Paper On Ease of Doing Business in Telecom and Broadcasting Sector

Intelsat is pleased to submit to Telecom Regulatory Authority of India (TRAI) its comments in response to TRAI's Consultation Paper on Ease of Doing Business in Telecom and Broadcasting Sector ("Consultation").

Intelsat would like to thank the TRAI for bringing out the consultation on the Ease of doing business in the Telecom and Broadcasting sector that seeks a holistic review of the procedures to improve inter-ministerial coordination and to streamline the compliance procedures in both sectors. Intelsat offers the following comments for TRAI's consideration.

Question #	Response and Comments
Q2. Whether the present system of licenses/permissions/registrations mentioned in para no. 3.81 or any other permissions granted by DoT requires improvement in any respect from the point of view of Ease of Doing Business (EoDB)?	<p>Intelsat's supports TRAI's initiative, as per Section 1.31 of the Consultation, in streamlining the application process. Intelsat has the following initial comments on how the current licensing system can be improved:</p> <ul style="list-style-type: none">• There is a need for a single online portal, wherein a telecom service provider (TSP) could apply for all the licenses/approvals without any further need to submit physical copies of the application and visit any department physically.• The licensing procedure should be handled by specific departments of the DoT, without involving, as much as feasible, multiple departments or authorities.• In approvals, where the process involves the movement of the application across various authorities and departments, the approval should be streamlined to make it completely integrated and accessible online in trackable response mode. <p>Intelsat would also like to mention that there should not be any issues on the authenticity of online applications and security aspects related to online filings. In India, several</p>

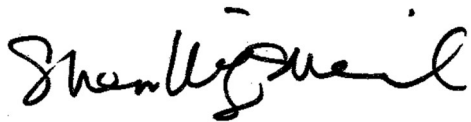
	<p>Government departments are already operating online, as the Ministry of Corporate Affairs, Revenue and Tax Departments, Banking, using Digital Signatures for submission of documents during public sector bids and auctions.</p>
<p>Q2. If yes, what steps are required to be taken in terms of</p> <p>a. Simple, online and well-defined processes</p>	<p>Intelsat congratulates the TRAI for the successful operation of the online licensing system, the 'SaraSanchar' portal. However, based on Table 3.1. of the Consultation it is visible that not all licenses are included in the SaraSanchar online system. Intelsat recommends that other approvals, like the Captive VSAT CUG license and the IFMC authorization, should also be incorporated in the online portal. Moving the application procedure online, will diminish costs of the physical licensing procedure and regulatory burdens, making licensing more efficient.</p> <p>The online system for approvals should comprise the following:</p> <ul style="list-style-type: none"> • Application forms filled online and saved automatically. • Option for applicant to download the application form in progress. • The ability for the applicant to track progress of the application review online. • Availability of final permission/license in a downloadable form to the applicant. • TSPs should not be required to re-submit the application file separately in any other forms such as in hard copy or through email.
<p>c. Precise and well-documented timelines along with the possibility of deemed approval</p>	<p>Intelsat notes that Sections 3.30 and 3.29 of the Consultation do not provide an exact timeframe for delivery of a decision of an application for VSAT captive and IFMC authorizations. Intelsat highlights that specific regulatory timelines are required for the transparency of the approval procedure and for the applicant to be able to plan its business operations. We recommend that for both the VSAT captive and IFMC authorizations, the applicant company shall be informed of the approval or rejection of the application within 30 days of submission of the application, as it is the case for the UL approval.</p>
<p>d. Well-defined and time bound query system in place</p>	<p>As TRAI notes in Section 3.80 of the Consultation, there is a need for a specific query system in place, where TSPs could request information on the licensing system and regulatory requirements for the approvals. When the queries come from prospective licensees, there is a need to have an exclusive unit or some mechanism in DoT to answer such queries of the inquiring entities which may be termed as Licensing-</p>

	<p>related queries. Intelsat has the following proposals for the query system:</p> <ul style="list-style-type: none"> • The query system could be online, or through a specific email where the applicants could address their queries. • There should be a specific timeline to answer the query, for instance 15 working days from submission of the query.
<p>Q9. Whether the present system of licenses/clearances/certificates mentioned in para no. 3.94 or any other permissions granted by WPC requires improvement in any respect from the point of view of Ease of Doing Business (EoDB)?</p>	<p>As per Section 3.88 of the Consultation, the WPC approval process requires a Letter of Intent before the grant of the final WPC License (WOL). Intelsat recommends that a straightforward approval process is used, where no letter of intent is required prior to the approval. Additionally, Intelsat recommends that, as much as feasible, the WOL approval procedure should be done online, using a process similar to 'SaraSanchar' portal.</p>
<p>Q10. Whether the present system of permission/approval mentioned in para no. 3.101 or any other permissions granted by NOCC requires improvement in any respect from the point of view of Ease of Doing Business (EoDB)?</p>	<p>Intelsat notes that in addition to the WOL, clearances are also required from NOCC. As per Section 3.95 of the Consultation, the functions of NOCC include online operational control, coordination, and monitoring of all the satellite-based services in India. TSPs are required to approach WPC and NOCC separately though they are housed under the same Department. This approach is lengthy and burdensome.</p> <p>Intelsat proposes the NOCC approval to be integrated in the WPC approval procedure. The NOCC network clearance procedure should not be distinguished from the WPC licensing procedure, as this adds unnecessary burden and extends the licensing timeline.</p> <p>Furthermore, as per Section 3.99 of the Consultation, an operator licensed by the DoT to operate a satellite network system, has to submit the details about the network and Earth station. Currently, this process is not done through an online system. Intelsat proposes that information about the network and earth station should be provided during the licensing process and not as a step following the approval. Moreover, the provision of such information could be implemented online through an online portal.</p>
<p>Q12. What measures should be taken to ensure that there is no duplicity in standards or in testing at BIS, WPC, NCCS, and TEC? Which agency is more appropriate</p>	<p>Intelsat supports TRAI statement in Section 3.105 (iii) of the Consultation, according to which there is an overlap and duplication in standards and testing of equipment in India. We agree that multiple certification requirements to be avoided as much as possible and that a simple procedure comprising simplified equipment certification should be</p>

<p>for carrying out various testing approvals?</p>	<p>applicable. Moreover, a single authority should undertake all the relevant certification and standards review. This authority could be TEC as the competent body without the involvement of other authorities.</p>
<p>Q13. Whether the present system of getting fresh and additional space segment capacity on Indian and foreign satellites for various services mentioned in para no. 4.15 or any other new service from DOS, requires improvement in any respect from the point of view of Ease of Doing Business (EoDB)? If yes, what steps are required to be taken in terms of:</p> <p>a. Simple, online and well-defined processes</p> <p>e. Seamless integration and approvals across various ministries/departments with the end-to-end online system</p>	<p>As explained in Sections 4.4 and 4.5 of the Consultation, the operation of a Satellite network requires several regulatory approvals granted by different authorities. The approximate timeline may take more than one year.</p> <p>Intelsat has the following proposals to improve the approval process for the provision of satellite capacity:</p> <ol style="list-style-type: none"> 1. The process should be moved online with the possibility of online documents submission and the ability of the applicants to track the progress of their application. 2. Intelsat proposes that all approvals should be made possible through one single authority, instead of separate decisions about Satellite Capacity from DOS, NOCC, WPC and SAFCA. The Department of Space should be responsible for authorizing the space segment and the WPC for authorization the ground segment, including approvals currently conducted by the NOCC. 3. The approval review could be done by the APEX Committee, meaning that the APEX Committee will operate as the single coordination point for all other downstream permissions, across the different departments/ministries/agencies. 4. Intelsat also notes that several of these approvals are needed each time new capacity is added on the network, even though it is on the same satellite and the same network. Intelsat supports TRAI's statement in Section 4.7 of the Consultation to allow a shared spectrum assignment to take place on a full-band basis and not be restricted to frequency spots to simplify the process of such assignment and administration. This will obviate the need for the TSPs to revert to the WPC for each additional frequency in case of network expansion.

As a final note, Intelsat is very thankful to TRAI for its intention to streamline the current licensing and compliance procedures. Intelsat stands ready to provide additional information on any of the topics discussed in this contribution.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Sherille Ismail". The signature is fluid and cursive, with a prominent initial "S" and a long, sweeping tail.

Sherille Ismail

Associate General Counsel