



Monday, October 29, 2018

Comments on the Consultation Paper on Methodology for levy of Spectrum Charges For provision of Satellite based Services using Gateway installed in India under 'sui-generis' category

On behalf of Elektroniklab India Pvt Limited we are happy to note this initiative from TRAI inviting inputs on the levy of spectrum charges and the opportunity that TRAI has given us to voice our comments.

Question 1

Do you agree that the formula based spectrum charges should be replaced with AGR based SUC in respect of provision of services by BSNL under its license for 'Provision and Operation of Satellite based services using Gateway installed in India' under 'sui-generis' category? If yes, what percentage of AGR should be the spectrum usage charges?

At EIPL (Elektroniklab India Pvt Ltd) we feel that the current spectrum charges are very high specially taking into consideration that the Inmarsat GSPS phones will be used predominantly by fishermen, disaster management teams and border forces fighting anti national elements. GSPS phones are generally not used as commercial communication tool, cannot be equated to a mobile cellular phone as the usage will be predominantly in emergency situation or in non GSM coverage areas. GSPS satellite phone enhances the safety and security of life at sea or in remote areas. This segment of the users cannot afford expensive equipment and usage tariff. **As GSPS services could save lives there should not be any SUC for GSPS.**

We would recommend Zero spectrum charges for these life saving devices. If at all a levy is needed then a very small ½ % AGR based charges may be considered. This will go a long way in enabling those risking their lives for a livelihood or those in the business of rescuing and saving lives with better communications anywhere anytime.

Question 2

In case your response to Q1 is negative, what should be the spectrum charges and how should it be calculated?

Not Applicable

Question 3

In your opinion, while determining the AGR for the purpose of levy of license fee and SUC, whether the cost of handsets (which is separately identifiable) should be allowed as deduction from the Gross revenue of BSNL's Satellite based services under 'sui-generis' category?

At EIPL we suggest that the cost of handsets cannot be included in determining the AGR these should be removed from calculating the AGR and should be deducted from BSNL gross revenue.

Question 4

If there are any other issues/suggestions relevant to the subject, stakeholders may submit the same with proper explanation and justification.

India is one of the very few countries in the world where there are severe restrictions in the use of satellite services. 1000s of lives could have been saved in the past if search & rescue teams or fishermen could have had portable mobile satellite devices. Lifesaving communication equipment like the Isatphone2 (GPS) are an essential part of enhancing the safety & security of the population of India. Very steep spectrum charges and annual license fee is intimidating poor fisher folk to buy a GPS satellite service.

The requirement to pay a license fee per each terminal is steep and discouraging for early adoption of these devices.

After the recent Cyclone / Flooding in Tamil Nadu and Kerala, there is a growing awareness for the importance of carrying a mobile satellite device. Fisheries laws in these states are being changed to make carrying a satellite device essential.

The restrictions in using data over the GPS gateway in India is hindering other lifesaving applications for fishermen. If data is made available weather information, weather forecasts & fish catch zones can be sent to a fishing boat . Fishermen can also be encouraged to send their fish catch records there by full filling the United Nations sustainable fishing goals.

The restrictions in using mobile satellite GPS services in coastal Tamil Nadu and Gujarat has to be removed in the larger interest of the South Indian fishermen who year after year have to face the perils of cyclones or the occasional tsunami.


Today Indian companies and services are going global. They are doing critical infrastructure projects in many countries that are politically and militarily unstable. It is important that a field engineer working in say Afghanistan have access to roaming facility in his mobile satellite GPS. Similarly incoming roaming should be freely allowed. The main reason being that there is a gateway in India.

With the gateway in India with full legal interception capabilities mobile satellite GPS should be treated at par with mobile roaming GSM services.

Finally an advisory should be sent to the Indian customs to remove the banners in airport that say "carrying satellite phones are illegal". Inmarsat phones that have global agreements must be allowed for use in India through the Indian gateway.

We thank you again for having given us this valuable opportunity to voice our opinion.

Kind Regards
For Elektroniklab India Pvt Ltd



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