



May 27, 2026

Via E-mail:

Telecom Regulatory Authority of India
Advisor (Networks, Spectrum and Licensing)
advmn@tra.gov.in

Attention: Shri Akhilesh Kumar Trivedia

Subject: Counter Comments from AST SpaceMobile on Consultation Paper No. 06 / 2026 on the Framework for Satellite Communication Network Authorisation, and Assignment of Spectrum to Satellite Communication Network Providers

Dear Sir:

This is in reference to the TRAI's Consultation Paper on the Framework for Satellite Communication Network Authorisation, and Assignment of Spectrum to Satellite Communication Network Providers dated April 8, 2026.

In this regard, AST SpaceMobile submits its counter comments to the consultation paper for your consideration.

Thank you for the opportunity to provide counter comments on this consultation paper.

Sincerely,

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COUNTER COMMENTS TO THE TRAI CONSULTATION PAPER ON THE “FRAMEWORK FOR SATELLITE COMMUNICATION NETWORK AUTHORISATION, AND ASSIGNMENT OF SPECTRUM TO SATELLITE COMMUNICATION NETWORK PROVIDERS”

This is with reference to the comments submitted by various stakeholders in relation to TRAI’s Consultation Paper dated April 8, 2026, on the Framework for Satellite Communication Network Authorisation and Assignment of Spectrum to Satellite Communication Network Providers, as available on TRAI’s website.

AST SpaceMobile submits its counter comments on the stakeholder responses to the above-mentioned consultation paper for TRAI’s consideration, as set out below:

I. There should be no mandatory synthetic conditions on foreign NGSO operator seeking Indian market access

AST SpaceMobile submits that the proposal by one stakeholder to mandate an Equal Rights Coordination Agreement (“ERCA”) as a precondition for market access is not appropriate and should not be adopted.

The proposal would effectively require foreign NGSO operators to guarantee the provision of coordination rights, interference protection, spectrum access, and operational standing in other jurisdictions. This would impose obligations on operators that are outside their control, particularly in relation to international coordination and rights granted by foreign jurisdictions. Such obligations are more appropriately addressed through the ITU coordination framework, which already provides a well-established mechanism for interference management and coordination rights between satellite operators across jurisdictions.

Making ERCA a non-waivable condition for spectrum assignment and coordination would introduce an artificial, prescriptive requirement that would limit participation in the SCN framework and thereby limit the solutions available to Service Authorisation holders in India, thereby creating a de facto restriction against SCN providers who hold “foreign” constellations.

More fundamentally, the proposed ERCA requirement is artificial, and introduces a mandatory and non-negotiable policy condition that is not aligned with the structure of the SCN framework. AST SpaceMobile strongly reiterates that SCN is a network-layer authorisation, and the regulatory approach should be light-touch and proportionate, consistent with its limited scope. Imposing an ERCA obligation would introduce an additional layer of prescriptive regulation that is not required for the functioning of the SCN framework. Therefore, TRAI should reject this proposal outright.

II. SCN entities should be permitted to hold spectrum

Stakeholder concerns that permitting SCN entities to hold spectrum may create arbitrage or distort the regulatory framework are misplaced. The proposed framework ensures that rights and obligations are aligned with the functional role of each entity.



SCN authorised entities are responsible for establishing, operating, and managing the satellite communication network. The SCN framework is expressly designed as a network-layer authorisation, with spectrum utilisation limited to enabling underlying network infrastructure.,

AST SpaceMobile reiterates its position that the SCN authorisation framework should remain technology-neutral and flexible, enabling SCN authorised entities to support Fixed Satellite Service (“FSS”), Mobile Satellite Service (“MSS”), and direct-to-device (“D2D”) connectivity, including where D2D services are enabled through commercial arrangements with licensed operators using IMT spectrum. This framework should remain flexible enough to accommodate evolving service delivery model where SCN entities may, in appropriate circumstances and subject to requisite authorisations, be involved in service provision closer to the end user. This flexibility is consistent with the global evolution of satellite service delivery models.

In order for the satellite operator to effectively discharge its operational and management responsibilities of the satellite, such entities must be vested with appropriate spectrum usage rights. The SCN framework does not create a parallel or lighter licensing pathway for service provision.

Further, restricting spectrum to service authorised entities, which do not establish or operate satellite networks, would be operationally impractical. Effective operation of SCN necessitates that the entity responsible for network deployment is able to access and utilise the associated spectrum and that the regulator has the ability to require the SCN licensee to cease transmissions in cases of harmful interference or for other valid national security purposes.

Finally, a network authorisation without corresponding spectrum usage rights would materially undermine the functional viability and independence of SCN entities. Without the ability to hold and use spectrum, SCN entities would be constrained in deploying and operating network infrastructure.

Accordingly, SCN entities should be permitted to hold and utilise spectrum in a manner consistent with their role as network operators. AST SpaceMobile reiterates its position that the framework should retain sufficient flexibility to accommodate evolving service delivery arrangements without prescribing rigid constraints at the authorisation stage.

III. Satellite spectrum should not be auctioned and instead should be assigned through the administrative route

One stakeholder has advocated for the auction of satellite spectrum and has rejected administrative assignment which generally relies on a First Come First Serve basis relying on the 2G judgment of the Supreme Court of India and on the basis of constitutional principles under Article 14 of the Indian Constitution regarding transparent, fair, and non-arbitrary procedures in alienating natural resources.



AST SpaceMobile submits that this position is not aligned with the regulatory and technical characteristics of satellite spectrum.

Section 4 of the Telecommunications Act, 2023 expressly preserves both auction and administrative assignment mechanisms, and does not mandate auctions for all categories of spectrum.

TRAI's recommendations dated May 9, 2025, are framed in accordance with Section 4 of the Telecommunications Act, 2023, under which satellite services falling within the First Schedule are assigned administratively.

Satellite spectrum is not a domestically originated resource that can be auctioned. Satellite operators file for spectrum rights at the ITU level and national authorities, including TRAI, can only administer and assign spectrum that is already coordinated and derived through international processes.

Further, AST SpaceMobile also opposes a hybrid model involving auction-based assignment combined with spectrum caps, rural service obligations, and price controls, that is supported by a stakeholder. AST SpaceMobile submits that such a model is similarly inappropriate, as it introduces additional layers of regulatory complexity without accounting for the nature of satellite spectrum rights.

AST SpaceMobile also notes that no country auctions satellite spectrum. Further, AST SpaceMobile reiterates its position made as comments to Query 14 of the consultation paper that administrative assignment, as opposed to auction, is internationally the established norm for MSS spectrum, including in the United States, the European Union, and the United Kingdom, because the ITU filing and coordination process itself ensures efficient use through coordination obligations.

An overwhelming majority of stakeholders have supported the position that satellite spectrum should be assigned through the administrative route. In this regard, one stakeholder has also noted that Entry 12 of the First Schedule to the Telecommunications Act, 2023 contemplates administrative assignment for "radio backhaul for telecommunication service".

Accordingly, any auction-based or hybrid models for satellite spectrum assignment should be rejected, and administrative assignment should be considered as the appropriate approach, consistent with the internationally coordinated nature of satellite spectrum.

IV. Structure, scope, and eligibility of the SCN framework

AST SpaceMobile submits that objections raised by certain stakeholders in relation to the scope, structure, and eligibility of the SCN framework are not well-founded and do not reflect the operational realities of satellite network deployment.



AST SpaceMobile notes that, while the SCN framework is primarily designed as a network-layer authorisation, the framework should retain sufficient flexibility to accommodate evolving service delivery arrangements.

AST SpaceMobile submits that one stakeholder's preference for a standalone satellite service authorisation under Section 3(1)(a) does not advance a viable alternative within the present consultation framework. The SCN construct under Section 3(1)(b) represents the operative regulatory mechanism currently under consideration and is specifically designed to enable network-as-a-service model.

Certain stakeholders have also proposed shorter or highly conditional validity periods of authorisation. AST SpaceMobile submits that Satellite deployments involve capital-intensive investments with long gestation periods, including satellite manufacturing, launch, and constellation deployment, with long operational lifecycles.

Shorter validity periods, or those subject to frequent review, would introduce regulatory uncertainty and undermine investment viability as explained in a detailed manner in our comments to Query 1 of the consultation paper. Accordingly, AST SpaceMobile reiterates that a long-term authorisation (preferably 20 years) aligned with satellite lifecycle considerations is essential to support sustainable development of the sector.

AST SpaceMobile further submits that overly prescriptive eligibility conditions may unnecessarily limit market participation and inhibit innovation in emerging satellite-driven business models.

V. There should be no mandatory control and visibility requirements with respect to baseband control

AST SpaceMobile submits that proposals seeking to mandate control, visibility, and access to SCN baseband and associated network systems are not appropriate and should not be accepted.

Certain stakeholders have proposed that SCN entities be required to provide control, visibility, resource allocation, and management capabilities to partnering service providers. In particular some stakeholders have, (i) proposed a regulatory mandate requiring such access; (ii) supported full control/visibility interfaces if SCN is permitted to maintain baseband; (iii) control, visibility, resource allocation, and management rights based on mutually agreed terms, but subject to approvals; and (iv) proposed the SCN entity to extend "appropriate" levels of control, visibility, resource allocation, and service management capabilities to partnering service authorised entities on mutually agreed terms.

AST SpaceMobile submits that such proposals introduce broad and prescriptive mandates that are not compatible with the operation of an SCN. Mandatory exposure of baseband systems to third parties would create significant commercial and competitive risks.



Additionally, such requirements would require SCN entities to share sensitive network-level information and operational control with entities that may be commercially connected to competitors in the Indian market.

Further, one stakeholder has supported mandating control and visibility requirements for certain high-level elements such as LI/CDR and baseband use in IMT spectrum scenarios. AST SpaceMobile, however, submits that concerns raised regarding control and operational visibility are already addressed through the partnership-based deployment model for IMT use cases.

In light of this, AST SpaceMobile submits that submissions mandating control, visibility, resource allocation, and management interfaces should be rejected and the SCN framework should allow commercially negotiated arrangements between parties, rather than prescribing control and visibility obligations.

VI. D2D via IMT must be enabled immediately and must not be deferred

AST SpaceMobile submits that stakeholder positions seeking to defer, restrict, or limit the framework for D2D via IMT are not appropriate and should not be adopted.

One stakeholder has proposed that D2D via IMT spectrum should be TSP-led and introduced in a phased manner. Another stakeholder supports alignment with international frameworks but conditions authorisation on post-WRC-27 review, and some other stakeholders support deferral of IMT-based D2D authorisation until after WRC-27 including for clarity on interference protection.

AST SpaceMobile strongly supports the position that IMT-based D2D should be enabled immediately, rather than being deferred or phased. A technology-neutral framework permitting all service categories, including IMT-based D2D, is feasible and necessary, and early enablement under a calibrated framework is achievable. Further, failure for India to move forward with an IMT-based D2D regime immediately, will leave it lagging behind other countries in the region, such as Japan, Australia, New Zealand and globally who are using SCN to address the digital divide in their countries, especially for mobile broadband services, such as AST SpaceMobile provides.

The IMT spectrum remains with and is controlled by the MNO partner, and accordingly, interference protection considerations are managed within that framework. One stakeholder, in its comments to the consultation paper, has cited its Direct-to-Cell service as evidence that no instances of harmful interference have been observed over more than two years of operations conducted under country-level authorisations, even prior to WRC-2027.

Further, an interim domestic deployment model may be adopted pursuant to Article 4.4 of the ITU Radio Regulations, pending international harmonisation.



AST SpaceMobile reiterates its comments made to Query 10 of the consultation paper that D2D-IMT connectivity is critical to bridging the digital divide by enabling efficient spectrum use, flexible broadband and narrowband services, and complementary coverage to terrestrial networks, including for emergency scenarios using everyday devices. Several stakeholders in their comments to the consultation paper have taken a similar view. Enabling D2D-IMT at this stage will therefore accelerate connectivity goals and ensure that India remains at the forefront of next-generation satellite-terrestrial integration.

Accordingly, phased or restricted approaches to IMT-based D2D are not warranted and a technology-neutral SCN framework permitting immediate enablement of all service categories, including IMT-based D2D, should be adopted.

VII. Charges related to fees must be minimal and administrative based

AST SpaceMobile submits that several stakeholder proposals relating to fee components are not aligned with the nature of the SCN framework. The SCN framework should adopt a light-touch and proportionate approach to fees and financial conditions, consistent with the nature of authorisation under Section 3(1)(b).

Entry fees

Certain stakeholders have proposed significantly higher entry fees including additional fee structures based on M2M analogues.

AST SpaceMobile submits the entry fee for SCN authorisation should reflect the administrative cost of processing and granting the authorisation and nothing more.

Accordingly, higher entry fees proposed by stakeholders are therefore disproportionate and not justified.

Application Processing Fee

Stakeholders have proposed significantly higher application processing fees, including aligning application fees with service authorisation fees.

In this regard, AST SpaceMobile submits that application processing fees should be limited strictly to recovery of administrative costs and the SESG precedent of INR 10,000 (Indian Rupees Ten Thousand) reflects the actual cost of processing a comparable network-layer application.

Rate of Authorisation Fee

Some stakeholders have proposed AGR-linked authorisation fees. AST SpaceMobile submits that SCN authorisation is a distinct category of authorisation with its own revenue and commercial characteristics. Imposing AGR-linked fees on SCN authorized entities, on top of the AGR-linked obligations and spectrum



charges already applicable to partnering service entities in respect of the same underlying commercial activity, may result in double levy.

AST SpaceMobile strongly reiterates that the SESG authorisation does not carry any authorisation fee and must be considered as the appropriate comparison.

PBG/ FBG (Bank Guarantees)

Certain stakeholders have proposed the imposition of performance and financial bank guarantees, including fixed PBG/FBG benchmarks and risk-based or milestone-linked guarantees.

AST SpaceMobile submits that the SESG is the appropriate network-layer comparator, and it carries no bank guarantee requirement.

Conclusively, AST SpaceMobile strongly reiterates, as it has done so in its comments to Queries 37, 38, 41, and 42 of the consultation paper that fee components applicable to SCN authorisation should remain minimal and strictly administrative in nature.