



Bharti Airtel Limited

India & South Asia
Airtel Center, Plot No. 16,
Udyog Vihar, Phase-IV,
Gurugram - 122015

www.airtel.in
Call + 91 124 4222222
Fax + 91 124 4243252

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27th May 2026

To,
Shri Akhilesh Kumar Trivedi
Advisor (Networks, Spectrum and Licensing)
Telecom Regulatory Authority of India,
World Trade Centre, Nauroji Nagar,
New Delhi – 110029

Subject: Bharti Airtel's Counter Comments on Consultation Paper on *the Framework for Satellite Communication Network Authorisation, and Assignment of Spectrum to Satellite Communication Network Providers*

Reference: 1. TRAI's Consultation Paper dated 8th April 2026
2. Bharti Airtel's Response dated 13th May 2026

Dear Sir,

This is in reference to TRAI's Consultation Paper on *the Framework for Satellite Communication Network Authorisation, and Assignment of Spectrum to Satellite Communication Network Providers* dated 08.04.2026. We had submitted our detailed response to the consultation on 13th May 2026.

In this regard, we now submit our counter comments towards some of the points raised by other respondents.

This is for your kind consideration.

Thanking you,

Yours sincerely,
For **Bharti Airtel Limited**

Tarun Chitkara
Vice President – Regulatory

Encl: a.a

Counter Comments to TRAI CP on “The Framework for Satellite Communication Network Authorisation, and Assignment of Spectrum to Satellite Communication Network Providers”

Executive Summary

Airtel thanks the Authority for the opportunity to provide its counter comments to responses received on the consultation paper (“CP”) “The Framework for Satellite Communication Network Authorisation, and Assignment of Spectrum to Satellite Communication Network Providers”. These counter comments are an extension of the arguments previously presented in the main response to the CP. For the sake of continuity, here is a quick summary of the key submissions made earlier:

- ✓ *D2D via IMT spectrum should be permitted immediately rather than being deferred until after WRC 27.*
- ✓ *D2D via IMT spectrum should only be permitted in FDD-based mid-bands (1800/2100 MHz) at this stage.*
- ✓ *NFAP should be suitably modified to include satellite-based D2D services in the relevant IMT bands identified for this purpose.*
- ✓ *At this stage, D2D via IMT spectrum should only be permitted where a single service provider holds the same spots across all LSAs. Harmonisation should be promptly carried out to enable the same.*
- ✓ *IMT spectrum being used for D2D services should not attract any additional charges.*
- ✓ *The preferred approach at this stage would be to enable D2D services only through IMT spectrum. However, if the Government decides to also permit D2D services using MSS spectrum, strict regulatory parity with terrestrial mobile operators should be ensured across all parameters including KYC, QoS, lawful interception, spectrum assignment framework etc.*
- ✓ *There should be a separate authorisation for installation/operation of SESGs/SNPs, with the provision to obtain feeder link spectrum assignment – either by expanding the scope of the proposed SESG Authorisation or by introducing separate SCN Authorisation.*

The eligibility conditions for such authorisation should be analogous to those proposed for SESG Authorisation; the area of operation should be National service area; and the validity period should be 20 years.

- ✓ *The user link spectrum should be allocated to the respective service providers.*
- ✓ *The terms and conditions, as recommended for spectrum assignment to service providers, should apply mutatis mutandis to SCN operators.*
- ✓ *SCN operators and service providers should be responsible for the security and other obligations applicable to network and service layers respectively, while avoiding duplication of compliance requirements.*

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- ✓ *The LF framework for an SCN operator should be at par with that of the service providers. Any rationalisation of levies must be applied uniformly across service providers and SCN operators.*
- ✓ *The requirement for BGs (both PBG and FBG) should be done away with. However, if the requirement of BGs is to be retained, an appropriate amount should be recommended by the Authority based on the corresponding requirements for service providers, while taking into account the restricted scope of the SCN authorisation being merely a network-layer authorisation.*
- ✓ *An SESG/SCN operator should also be allowed to connect its SESGs/SNPs with its PoPs without having to acquire any other license/authorisation.*
- ✓ *Only entities holding the UL (Access/Internet/NLD/Commercial VSAT CUG/GMPCS), or equivalent service authorisations for NSOs under the new authorisation regime, and not VNOs, should be permitted to seek SCNaaS from SCN operators.*
- ✓ *The SESGs/SNPs established in India should be allowed to be used to provide feeder-link connectivity to satellites that are providing connectivity to customers outside of India.*
- ✓ *There should be no mandatory requirement for SatCom operators to extend control/visibility/ resource allocation/management to service providers.*
- ✓ *The agreements between SCN operators and service providers should be left to mutual commercial negotiation and market forces with no mandatory reference agreement.*
- ✓ *The charges payable by service providers to SCN operators for SCNaaS, should be left to mutual commercial negotiation and market forces.*
- ✓ *The charges paid for SCNaaS should be allowed as deductions from the ApGR for arriving at the AGR for levy of LF/SUC on service providers.*
- ✓ *There is no need for an interconnection framework for satellite-based telecommunications networks with other telecom networks at this stage.*

In the following section Airtel submits its counter comments on key points raised by some of the stakeholders.

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(a) D2D via IMT Spectrum:

Some of the stakeholders have suggested to defer the decision on D2D via IMT spectrum till WRC-27 outcome. The main apprehension of such stakeholders appears to be stemming from potential interference issues with terrestrial IMT services.

Response:

As also submitted in our main response to the instant CP, **D2D via IMT spectrum should be permitted at this stage itself, and there is no need to wait for the outcome of WRC-27.** As far as the apprehensions of some stakeholders are concerned, we wish to submit as follows:

Manageable coexistence and protection of existing services:

Since IMT spectrum is already assigned to access service providers and governed by detailed technical conditions, any satellite-based D2D implementation will necessarily be **planned and managed by the same licensees**, ensuring that terrestrial IMT services are protected. Multiple **global examples already demonstrate that D2D via IMT services can safely coexist with terrestrial IMT services** and that proactive domestic regulation is feasible ahead of WRC-27.

In any case, the regulatory framework for D2D via IMT spectrum may be made subject to **appropriate technical conditions** (e.g., power limits, coordination rules, phased roll-out). These conditions can be **further refined in light of future WRC-27 outcome**, rather than keeping the service completely on hold until then.

Consumer and societal benefits:

D2D via IMT spectrum can **dramatically improve the coverage in remote, rural, hilly and disaster-prone areas** where terrestrial roll-out is delayed or uneconomical, thus directly supporting the goals of universal service and Digital India. Allowing D2D now will also strengthen the resilience of communications during natural disasters and other emergencies by providing a **backup connectivity layer** integrated with the existing mobile networks and devices. Early permission in India will **ensure that Indian users and networks are not left behind.**

Regulatory certainty for investments:

D2D via IMT spectrum requires significant investment in satellite payloads, gateways, network integration and device development. Investors need a clear regulatory signal that such services are permissible in India. Deferring the decision until after WRC-27 would create **prolonged uncertainty, potentially causing India to miss out on current investment and partnership opportunities** as global operators and vendors move ahead in other markets which have already allowed IMT-based D2D.

WRC-27 is not a prerequisite:

ITU/WRC outcomes are important for long-term global harmonisation, but they are not a legal prerequisite for India to permit innovative services within nationally assigned IMT bands, so long as India remains within its ITU obligations on existing allocations. India will be better placed if it has already gained practical experience through controlled deployment rather than starting from zero after WRC-27 concludes. **Several countries, including the US, the UK, Brazil, Australia and Canada have already moved**

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ahead with D2D trials or frameworks in IMT-identified bands while WRC-27 preparatory work continues, illustrating that early national action is compatible with ongoing international harmonisation.

IMT-based D2D should be immediately permitted with appropriate safeguards:

It is pertinent to clarify here that we do not intend to entirely dismiss the apprehensions of potential interference. In fact, Airtel has itself suggested to **allow IMT-based D2D, at this initial stage, only in 1800/2100 MHz and only where a single service provider holds the same spots across all LSAs.**

Thus, we duly acknowledge the possibility of interference issues; however, we strongly submit that the same does not provide adequate justification for deferring the introduction of IMT-based D2D altogether. On the contrary, it only means that appropriate guardrails are required alongside introduction of IMT-based D2D. We submit that the modalities suggested by Airtel as well as global best practices would provide a sufficient safeguard at this stage. **These modalities may be suitably modified in line with the outcome of WRC-27.**

Therefore, Airtel re-iterates the following:

- (i) **D2D via IMT spectrum should be permitted immediately with appropriate safeguards, rather than being deferred entirely until after WRC-27.**
- (ii) **D2D via IMT spectrum should only be permitted in FDD-based mid-bands (1800/2100 MHz) at this stage.**
- (iii) **At this stage, D2D via IMT spectrum should only be permitted where a single service provider holds the same spots across all LSAs. Harmonisation should be promptly carried out to enable the same.**

(b) D2D via MSS Spectrum:

One of the stakeholders has suggested to enable MSS-based D2D through a separate light-touch “Satellite D2D Service Authorisation” under Miscellaneous Services, modelled on IFMC Authorization.

Response:

Airtel reiterates that **the preferred approach at this stage would be to enable D2D services only through IMT spectrum. However, if the Government decides to also permit D2D services using MSS spectrum, strict regulatory parity with terrestrial mobile operators should be ensured across all parameters, including KYC, QoS, lawful interception, security obligations and spectrum assignment framework, so as to maintain a level playing field.**

As submitted in our main response, terrestrial mobile operators have invested heavily in long term network infrastructure, coverage expansion and service innovation. Regulatory approaches to emerging satellite services must therefore **safeguard these investments and avoid undermining the sustainability of terrestrial networks.** If MSS operators are allowed to offer mass market D2D to mobile handsets

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without comparable regulatory obligations, it would create an asymmetry and regulatory arbitrage between functionally substitutable services in the same retail market.

In any case, D2D via IMT spectrum (offered mandatorily through terrestrial access operators) would ensure ubiquitous connectivity for users – both indoors and outdoors – across different regions (urban/densely populated as well as rural/remote). Even global 3GPP NTN standards and device-ecosystem efforts for D2D are focused on the IMT spectrum, not on the MSS spectrum. Thus, **IMT-based D2D would allow faster rollout by leveraging the existing investments of mobile operators and has better device ecosystem.**

Thus, D2D should, for now, be exclusively pursued via IMT spectrum in partnership with access-service providers. If MSS-based D2D is nevertheless introduced, there should be strict regulatory parity with terrestrial mobile operators. This is essential to preserve **competitive neutrality between functionally similar services offered on mobile handsets, whether the last-mile link is terrestrial or satellite.**

Therefore, Airtel reiterates the following:

- (i) **Currently, D2D services should only be permitted through IMT spectrum, limited to FDD mid-bands and harmonised spectrum holdings, as this provides the fastest, most efficient and globally aligned route for rollout by leveraging existing terrestrial mobile networks, harmonised spectrum ecosystems, mature device availability and significant investments already made by licensed mobile operators.**
- (ii) **The preferred approach at this stage would be to enable D2D services only through IMT spectrum. However, if the Government decides to also permit D2D services using MSS spectrum, strict regulatory parity with terrestrial mobile operators should be ensured across all parameters, including KYC, QoS, lawful interception, security obligations and spectrum assignment framework, so as to maintain a level playing field.**