



**Digital Communications India Forum (DCIF)**  
(A Unit of PTC India Foundation)

File no: DCIF/Technology Committee/5/5/26/01

To,  
**Shri Akhilesh Kumar Trivedi**  
Advisor (NSL),  
Telecom Regulatory Authority of India,  
World Trade Centre, Tower-F, (4th to 7th Floors),  
Nauroji Nagar, New Delhi- 110029

Date: 13<sup>th</sup> May 2026

**Subject: Submission of Digital Communications India Forum (DCIF) A unit of PTCIF  
Response to Consultation on Satellite Communication Authorization**

Ref: TRAI Consultation Paper No. 06/2026 dated 08 April 2026

Respected Sir,

Please find enclosed the response of the Digital Communication India Forum (DCIF) to the consultation paper on the framework for Satellite Communication Network (SCN) authorization and spectrum assignment.

The submission has been prepared after detailed deliberations and reflects a balanced approach that supports growth and innovation in satellite communications through a light-touch regulatory framework, while ensuring robust safeguards relating to national security, routing sovereignty, data localization, transparency, accountability, and citizen safety.

The response also highlights the need for regulatory certainty, phased localization under Make in India, and enforceable jurisdictional mechanisms for foreign satellite operators, given the strategic and dual-use nature of satellite communication systems.

We trust that the enclosed submission will be useful in finalizing a progressive and secure regulatory framework. DCIF would be pleased to provide any further clarification or participate in stakeholder discussions, as may be required.

Thanking you,

Sd-

**Yours sincerely,**  
**Ravindra Kumar Mishra**  
Secretary General  
Digital Communication India Forum  
Mobile no. 9868500087  
Email id: [secretarygeneral@dcif.org.in](mailto:secretarygeneral@dcif.org.in),  
[ravikmishra12@gmail.com](mailto:ravikmishra12@gmail.com)



**Digital Communications India Forum (DCIF)**  
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**File no: DCIF/Technology Committee/5/5/26/01 Date: 12 May 2026**

**Ref: TRAI Consultation Paper No. 06/2026 dated 08 April 2026**

**Framework for Satellite Communication Network (SCN) Authorisation and Spectrum Assignment**

**1a. Background**

This submission presents detailed, question-wise responses to the TRAI Consultation Paper on the framework for Satellite Communication Network (SCN) authorisation and spectrum assignment.

The approach adopted herein is to first set out the technical position for each question and thereafter outline additional regulatory safeguards covering security, operations & maintenance (O&M), routing, data sovereignty, transparency, accountability, audits, Make in India, citizen safety, financial penalties and enforceability including [negotiated] efforts to make jurisdiction of our Laws global for foreign satellite operators.

Satellite systems being inherently dual use, a calibrated framework is essential to balance growth and innovation with national security, further strengthening of sovereign control, lawful interception, payload transparency, dual-use mitigation, strategic oversight, sustainability, and calibrated licensing safeguards.

**1b.** In addition, following Safeguards are also suggested which are applicable for all questions:

- Security & O&M: India-based NOC and gateways: critical control functions retained in India; restricted & monitored remote access; full audit logs, to ensure national security and sovereignty; complete internal details of the satellite should be available to Indian authorities for security aspects;
- Routing: All domestic traffic must route through India-based gateways; no bypass of Indian jurisdiction.
- Data Sovereignty: User, financial and operational data to be stored in India; any sharing must be need-based, transparent and auditable with logs.
- Transparency & Audits: Mandatory periodic audit of security, routing and compliance; disclosure of foreign dependencies and engagements.
- Make in India: Phased localisation over 3-5 years for gateways, NOCs, OSS/BSS, User Terminals and ground infrastructure.
- Citizen Safety: Strong data protection, prevention of misuse/surveillance, incident reporting.
- Penalties: Graded financial penalties linked to violations & revenues; suspension/ revocation for serious violations.
- Jurisdiction: Efforts should be made for global jurisdictional of Indian Laws, for foreign satellite operators.
- M2M/ IOT services should follow oneM2M standard approved by DOT/TSDSI.

There should be operational Lawful interception capability linked to monitoring system (LIS) as satellite service is more prone to be misused by unlawful elements.

**Digital Communications India Forum (DCIF)**

**Registered Address: TCIL Bhawan, Greater Kailash - 1, New Delhi - 110048, India**  
**Email: [info@dcif.org.in](mailto:info@dcif.org.in)**



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**Regulatory and Technical Issues:**

**Q-1. What should be the eligibility conditions, area of operation, validity period of authorisation and the scope of the proposed Satellite Communication Network (SCN) authorisation under Section 3(1)(b) of the Telecommunications Act, 2023? Kindly provide a detailed response with justification.**

**DCIF Response:**

Only Indian Registered Companies with majority Indian shareholding, and having competence in satellite communications should be considered.

Nationwide service area. Validity minimum 15 years with review every 5 years. Scope should include all voice and data services.

A calibrated Policy & Regulatory framework is recommended to promote growth of service, to achieve economies of Scale for affordable tariffs, while preserving national security & sovereignty, along with full compliance of Indian Laws.

SCN entity should retain full control over technical facilities & spectrum and should be responsible for all regulatory compliances.

Regulatory certainty is essential in view of capital intensive nature of the infrastructure.

The general concerns mentioned in the introductory write-up should also be adequately applied.

**Q-2. What should be the terms and conditions (general, technical, operating, security related etc.) that should be made applicable for the proposed Satellite Communication Network authorisation? Kindly provide a detailed response with justification.**

**DCIF Response:**

Appropriate Regulations for growth, while ensuring adequate government oversight on security & sovereignty aspects, in line with the provisions of Telecom Act 2023 and India's Space Policy. Conditions should be conducive for ease of doing business. Graded financial penalties linked to violations & revenues; suspension/ revocation for serious violations. Efforts should be made for global jurisdiction of Indian Laws, for foreign satellite operators. The general concerns mentioned in the introductory write-up should also be adequately applied. AMF and UPF Anchoring for interconnection to IMT interface should be ensured by SCN operator specially with 5G networks, Lawful Interception, security testing of equipment and Equipment



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Identity Registration EIR (for all terminals, platform, gateways etc) should be mandatory. There should be a monitoring system including beam footprint monitoring, unauthorised transmission detection, cross-border spillover detection, frequency misuse monitoring, jamming, and spoofing detection

**Q-3. Which type of authorised entities should be permitted to seek Satellite Communication Network as a Service (SCNaaS) from the entities holding the proposed Satellite Communication Network authorisation? Whether Virtual Network Operators (VNOs) should also be permitted to seek SCNaaS? Kindly provide a detailed response with justification.**

**DCIF Response:**

The overall control and responsibility for compliances, including spectrum, must remain with the SCN operator. In case of D2D using IMT spectrum, the MNOs may be allowed to collaborate with SCN Operators appropriately, without diluting the Security & Sovereignty aspects. Entities including VNOs may be considered after reasonable experience.

**Q-4. Whether the SCN authorised entity establishing, operating, maintaining, or expanding the baseband system alongwith SCN should be mandated to extend control, visibility, resource allocation and management of the telecommunication services, being provisioned using SCN to users, to the partnering entity on mutually agreed terms and conditions? Please provide a detailed response with justification.**

**DCIF Response:**

SCN operator must retain full control of network, resources and spectrum. Partners may assist but not control. Responsibility for all regulatory compliances will remain fully with the SCN Operator. In case of D2D using IMT spectrum, the MNO & SCN can be allowed some flexibility for the arrangement between them, without diluting the security & sovereignty aspects.



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**Q-5. What provisions should be included in the terms and conditions of Satellite Communication Network (SCN) authorisation considering the policy/ Act in the Space sector? Kindly provide a detailed response with justification.**

**DCIF Response:**

The Regulatory framework should align with Telecom Act, Space Policy and IN-SPACE guidelines. India-based NOC and gateways should be mandatory with graded penalties, for violations, if any. Responsibility for regulatory compliances should remain with the SCN Operator.

**Q-6. Whether there is any need for mandating a reference agreement between the entities holding the proposed Satellite Communication Network authorisation and the authorised entities providing telecommunication service? If yes, what should be the salient features of the reference agreement between such entities? Kindly provide a detailed response with justification.**

**DCIF Response:**

A broad reference agreement is recommended with some flexibility for partnering entities, based on market forces. Overall control & responsibility for all satellite based operations should be with the SCN Operator.

**Q-7. With respect to the interconnection with the proposed Satellite Communication Network Authorised Entities, whether there are any other issues in addition to those raised in TRAI's consultation paper on 'Review of existing TRAI Regulations on Interconnection matters' dated 10.11.2025, which require to be addressed in this consultation process? Please provide a detailed response with justification.**

**DCIF Response:**

Existing interconnection regulations should include SCN entities and allow reasonable flexibility without discrimination.



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**Q-8. Any other inputs or suggestions relevant to the proposed Satellite Communication Network authorisation may kindly provided with detailed justification.**

**DCIF Response:**

The SCN Operator should provide complete details of the system, including satellite's internal details, as required, to meet India's security & sovereignty issues and international liabilities. The inter satellite link including switch details, VPNs, routing, and traffic related parameters should be available with SCN operator to avoid user plane traffic going to foreign networks.

**Q-9. Which of the following services should be permitted to be provided by using the SCNs established by the proposed SCN authorised entities:**

- (a) Fixed Satellite Service (FSS);**
- (b) Mobile Satellite Service (MSS);**
- (c) Direct-to-Device (D2D) Service via satellite by using MSS spectrum;**
- (d) Direct-to-Device (D2D) Service via satellite by using IMT spectrum?**

**Kindly provide a detailed response with justification.**

**DCIF Response:**

SCN operator should be allowed to provide all satellite-based voice and data services including FSS, MSS and D2D, with reasonable flexibility. The universal service obligation should be applied on SCN operator to ensure connecting unconnected area.

**Q-10. Whether D2D Service via satellite by using IMT spectrum should be permitted at this stage itself, or should this matter be examined after considering the outcome of WRC-2027? Kindly provide a detailed response with justification.**

**DCIF Response:**

IMT-based D2D may be allowed initially as pilot; commercial rollout after WRC-27 outcomes. The Pilot projects should also meet all security requirements. After WRC-27 decisions, the international co-existence regulations should be applied.

**Q-11. From the perspective of holding spectrum for the feeder link and the user link on SCNs, which of the following combinations should be permitted at the SCNs established by the proposed SCN authorised entities:**



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<b><u>Combination No.</u></b>	<b><u>Spectrum for the feeder link held by -</u></b>	<b><u>Spectrum for the user link held by -</u></b>
1	SCN authorised entity	SCN authorised entity
2	SCN authorised entity	-
3	Partnering entity (service provider)	SCN authorised entity
4	Partnering entity (service provider)	Partnering entity (service provider)

**Kindly provide a detailed response with justification.**

**DCIF Response:**

SCN operator should retain full control of spectrum; partner entities may assist. Single integrated control is practical & essential. For D2D using IMT spectrum, the MNO can have control on spectrum, however control and responsibility for its usage on satellite should be with the SCN operator.

**Q-12. Which of the following types of spectrum should be assigned to the proposed SCN authorised entities:**

- (a) Spectrum in the frequency bands allocated for FSS**
- (b) Spectrum in the frequency bands allocated for MSS**
- (c) Any other?**

**Kindly provide a detailed response with justification.**

**DCIF Response:**

SCN operator should control FSS, MSS and related spectrum assigned by administration. The IMT Spectrum for D2D applications will already be with the MNO, who is collaborating with the SCN Operator. However, for the use of this IMT spectrum on satellite, the SCN Operator should be responsible for all compliances.

**Q-13. What should be the broad policy and regulatory framework for the assignment of FSS spectrum and/ or MSS spectrum to the proposed SCN authorised entities? Specifically, -**

- (a) NGSO-based FSS and GSO/ NGSO-based MSS: Whether in respect of**

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**Registered Address: TCIL Bhawan, Greater Kailash - 1, New Delhi - 110048, India  
Email: info@dcif.org.in**



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NGSO-based FSS and GSO/ NGSO-based MSS, TRAI's recommendations dated 09.05.2025 on 'Terms and Conditions for the Assignment of Spectrum for Certain Satellite-Based Commercial Communication Services' to DoT (read with the TRAI's response dated 08.12.2025 to DoT's back-reference dated 12.11.2025) should be made applicable to SCN authorised entities with necessary modifications? If yes, what modifications would be required in the terms and conditions for the assignment of spectrum for NGSO-based FSS and GSO/ NGSO-based MSS? If no, what should be the terms and conditions for this purpose?

- (b) **GSO-based FSS**: Whether the terms and conditions for the assignment of spectrum to SCN authorised entities for GSO- based FSS should be analogous to those recommended by TRAI for NGSO-based FSS and GSO/ NGSO-based MSS through its recommendations on 'Terms and Conditions for the Assignment of Spectrum for Certain Satellite-Based Commercial Communication Services' dated 09.05.2025 (read with the TRAI's response dated 08.12.2025 to DoT's back-reference dated 12.11.2025) with necessary modifications? If yes, what modifications would be required for GSO-based FSS? If no, what should be the terms and conditions for this purpose?

Kindly provide a detailed response with justification.

**DCIF Response:**

TRAI recommendations of May 2025 and Dec 2025 responses should apply with minor modifications and largely similar terms. FSS & MSS spectrum has to be assigned in an administrative manner, as indicated in the Schedule to Telecom Act 2023 and the general global practice.

- Q-14. What should be the eligibility conditions for seeking administrative assignment of FSS spectrum and/or MSS spectrum by the proposed SCN authorised entities? Kindly provide a detailed response with justification.**

**DCIF Response:**

Administrative assignment as per Telecom Act; light-touch regulation recommended. There need not be any separate eligibility conditions for seeking administrative assignment of spectrum, once the service authorization has been obtained by the SCN Operator. The WPC Wing can consider the justification and assign justified amount of FSS & MSS spectrum.

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**Registered Address: TCIL Bhawan, Greater Kailash - 1, New Delhi - 110048, India**  
**Email: [info@dcif.org.in](mailto:info@dcif.org.in)**



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**Q-15. Whether there are any other inputs or suggestions relevant to the assignment of FSS spectrum and/ or MSS spectrum to the entities holding the proposed SCN authorisation? Kindly provide a detailed response with justification.**

**DCIF Response:**

A calibrated light-touch regulatory approach should encourage growth, while embedding & ensuring sovereign safeguards.

**Q-16. In case it is decided to permit the proposed SCN authorised entity to utilize the FSS spectrum and/ or MSS spectrum assigned to a service authorised entity (“partnering entity”) for the purpose of providing SCNaas to the partnering entity –**

**whether there is a need to establish a policy and regulatory framework for enabling the SCN authorised entity to enter into an agreement/ arrangement with the partnering entity to utilize FSS spectrum and/ or MSS spectrum assigned to such partnering entity for the purpose of providing SCNaas to the partnering entity?**

- (i) If yes, what should be the terms and conditions under such a framework?**
- (ii) If no, in what manner such agreements/ arrangements should be enabled and regulated?**

**Kindly provide a detailed response with justification.**

**DCIF Response:**

SCN operator should retain control and be responsible for all compliances. However, in future, if multiple SCN operators/ authorized entities are allowed shared use of their assigned FSS and/ or MSS spectrum, Terms and Conditions similar to what were specified for sharing of spectrum among Cellular/ IMT service operators, may be considered.

**Q-17. Whether there are any other inputs or suggestions relevant to the agreement/ arrangement between the proposed SCN authorised entities and service authorised entities (“partnering entities”) to utilize the FSS spectrum and/ or MSS spectrum assigned to such partnering entities? Kindly provide a detailed response with justification.**



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**DCIF Response:**

Agreements should be market-driven; SCN operator should retain control and be responsible for all regulatory compliances.

**Q-18. In case it is decided to permit D2D service via satellite by using the spectrum in the frequency bands allocated for MSS such as L-band and S-band, whether there is a need to establish a policy and regulatory framework for enabling and regulating such a service? If yes, kindly suggest a broad framework for this purpose and the key terms and conditions to be included under such a framework? Kindly provide a detailed response with justification.**

**DCIF Response:**

Separate framework may not be required; ITU Radio Regulations and national GMPCS guidelines are sufficient. In fact, existing MSS/ GMPCS frameworks provide service similar to D2D. All devices used should have CEIR (Centralized Equipment Identity Register) to do white, grey and black device listing & identification and authorization before use to avoid un-authorized devices and equipment in service at any time. The subscriber should have single bill No should deal with single agency for customer care.

**Q-19. In case with a view to enable D2D service via satellite using IMT spectrum, it is decided to permit the proposed SCN authorised entity to utilize IMT spectrum assigned to a service authorised entity (“partnering entity”) for the purpose of providing SCNaas to the partnering entity, -**

- (a) whether there is a need to establish a policy and regulatory framework for enabling the SCN authorised entity to enter into an agreement/ arrangement with the partnering entity to utilize IMT spectrum assigned to such partnering entity for the purpose of providing SCNaas to the partnering entity? If yes, what should be the terms and conditions under such a framework? If no, in what manner such arrangements should be enabled and regulated?**
- (b) Which frequency bands identified for IMT should be considered for this purpose? Specifically, whether only FDD-based frequency bands should be considered?**
- (c) For the frequency bands identified for IMT where D2D is decided to be permitted, whether the National Frequency**

Allocation Plan (NFAP) should be modified to include MSS on a  
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**Registered Address: TCIL Bhawan, Greater Kailash - 1, New Delhi - 110048, India**  
**Email: [info@dcif.org.in](mailto:info@dcif.org.in)**



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secondary basis? If yes, kindly furnish your suggestion for the proposed modification(s).

- (d)** To mitigate the issues related to cross-border interference, whether any other condition in addition to Article 4.4 of the ITU-Radio Regulations is required to be made applicable?
- (e)** What regulatory framework should be established for ensuring interference-free operation of D2D service via satellite by using IMT spectrum within the country? Specifically, which of the following methods should be followed:
  - (i)** The SCNs established by SCN authorised entities should be permitted to be used to provide D2D service via satellite by using IMT spectrum only if a single partnering entity (access service provider) holds the relevant IMT frequency channel in all the 22 LSAs of the country and agrees to permit the usage of its IMT frequency channel by the SCN authorised entity at its SCN for the purpose of providing SCNaas; or
  - (ii)** The SCNs established by SCN authorised entities should be permitted to be used to provide D2D service via satellite by using IMT spectrum if one or more access service providers, together holding the assignment of the relevant IMT frequency channel across all 22 licensed service areas of the country, agree to allow the usage of their IMT frequency channel by the SCN authorised entity at its SCN for the purpose of providing SCNaas; or
  - (iii)** Any other method?

**Kindly provide a detailed response with justification.**

**DCIF Response:**

Market-driven agreements between MNO and SCN Operators; only FDD use of bands practical; NFAP will need to be updated post WRC-27; nationwide spectrum required; operators should be able to stop/ switch off transmissions for interference control, as well as for any other regulatory/ administrative control. Commercial operation of IMT D2D will be practical after WRC-27 decisions about use of IMT Spectrum for D2D.



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**Q-20. Whether there are any other inputs or suggestions with respect to the delivery of D2D services via satellite through SCNs established by the proposed SCN authorised entities? Kindly provide a detailed response with justification.**

**DCIF Response:**

In addition to other stipulations indicated in response to other questions, the interference control for adjoining areas, will need to be coordinated before allowing commercial operations.

There must be facility for tracing and visualization of devices with geofencing with facility for inspection and audit to ensure only lawful use of service. All equipment should be security tested and cleared by DOT prior to use.

**Q-21. Any other inputs or suggestions related to the use of spectrum on SCNs established by the proposed SCN authorised entities may be submitted with proper explanation and justification.**

**DCIF Response:**

Please refer to Para no.1b above

**Financial Issues:**

**Q-22. Regarding the agreement between SCN Authorised entity and a Service Authorised entity providing FSS/ MSS to the end user, for provision of SCNaas to the Service Authorised entity, which may or may not include provisions for utilization of FSS/ MSS spectrum assigned to the Service entity, is there a need to regulate charges exchanged between the two entities under such an agreement? If yes, what would be the possible parameters, including SLA parameters, Spectrum utilization etc., which would form the basis of regulation? Please provide your response with justification.**

**DCIF Response:**

Charges between partnering entities should be allowed to be market-driven, especially if there is adequate competition; SCN operator retains spectrum responsibility. A cap/ max. charges can be specified, if necessary. global jurisdictional commitments for foreign satellite operators.



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**Q-23. In case of an agreement between an SCN Authorised entity and a Service Authorised entity providing D2D services using MSS spectrum, for provision of SCNaaS to the Service Authorised entity, which may or may not include provisions for utilization of MSS spectrum assigned to the Service entity amongst other possible spectrum utilization arrangements, is there a need to regulate charges exchanged between the two entities under such an agreement? If yes, what would be the possible parameters, including SLA parameters, Spectrum utilization etc., which would form the basis of regulation? Please provide your response with justification.**

**DCIF Response:**

Market-driven. A cap/ max. charges can be specified, if necessary.

**Q-24. In case of an agreement between an SCN Authorised entity and a Service Authorised entity providing D2D services using IMT spectrum, for provision of SCNaaS to the Service Authorised entity, which may or may not include utilizing spectrum for feeder link assigned to the service entity, besides utilizing IMT spectrum assigned to the Service Authorised entity, is there a need to regulate charges exchanged between the two entities under such an agreement? If yes, what would be the possible parameters, including SLA parameters, Spectrum utilization etc., which would form the basis of such regulation? Please provide your response with detailed justification.**

**DCIF Response:**

Market-driven. The SCN Operator and the collaborating IMT Operator should be allowed to fix their charges. With adequate competition, market forces will bring down these charges. With volumes, the tariffs will also move towards affordable levels. A cap/ max. charges can be specified, if necessary.

**Q-25. Should the charges paid by the Service Authorised entity (providing either FSS, MSS or D2D service to the end user) to SCN Authorised entity for provisioning of Satellite Communication Network as a Service (SCNaaS), be permitted to be deducted from ApGR of the Service Authorised entity for the purpose of arriving at AGR for levy of License/ Authorisation Fees and Spectrum charges? Please provide your response with justification.**

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**Registered Address: TCIL Bhawan, Greater Kailash - 1, New Delhi - 110048, India  
Email: [info@dcif.org.in](mailto:info@dcif.org.in)**



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**DCIF Response:**

Market forces should govern. Reasonable charges paid by SCN Operator or SCNaas Operator, should be allowed to be deducted from ApGR. A cap on such charges can be specified, if necessary.

**Q-26. If the answer to the above question is no, please suggest the methodology for considering such charges in determination of AGR of both the service authorised and SCN authorised entities, for purposes of levying Authorisation/ License fees & Spectrum Charges? Please provide your response with justification.**

**DCIF Response**

Similar to Q25 response.

**Q-27. What should be the appropriate definition of GR, AGR, and ApGR for SCN Authorisation, including the relevant items of revenue, exclusions and deductions? Additionally, are there any operational or non-operational revenue elements specific to SCN Authorized entities that should be considered within the scope of definitions of GR, AGR and ApGR? Please provide detailed response with specific line items of revenue, exemptions and deductions, and specific definitions for GR/ApGR/AGR.**

**DCIF Response**

Definitions should be simple unambiguous and similar to others TSP's Operators

**Q-28. In case FSS/MSS or any other spectrum is assigned to the Satellite Communication Network (SCN) authorised entities for provisioning of SCNaas to Service authorized entities, what should be the broad financial terms & conditions of such an assignment?**

**DCIF Response**

Total charges Revenue share ~1% of AGR recommended, along with a reasonable minimum annual charges per MHz (different for different frequency bands), and review after growth to a reasonable level, say after 5 years.



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**Q-29. Should the spectrum charges for Satellite Communication Network (SCN) authorised entities be based on the spectrum charging framework as per the Recommendations dated 09.05.2025 applicable for Satellite based commercial communications services? Accordingly, what should be the appropriate spectrum charging framework and spectrum charges applicable for a SCN Authorised entity? Please provide your response with detailed justification.**

**DCIF Response**

Same answer as given at Question 28 above

**Q-30. If spectrum charges are to be levied on the basis of AGR of the SCN Authorised entity, are there any specific operational/ non-operational revenue items that should be excluded from AGR for the purpose of determination of spectrum charges? Please provide your response with detailed justification.**

**DCIF Response**

To be simple and practical. The revenue from SatCom services only should be considered for calculating AGR. Only telecom revenues should be considered towards AGR calculation, like it is for TSP.

**Q-31. If the spectrum charges are not to be levied on basis of AGR of the SCN Authorised entity, what should be the appropriate spectrum charging mechanism and the corresponding level of spectrum charges applicable to Satellite Communication Network (SCN) authorised entities? Please provide your response with detailed justification.**

**DCIF Response**

Low and simple structure. Revenue share of 1% along with a reasonable minimum annual charges per MHz (different for different frequency bands), and review after growth to a reasonable level, say after 5 years.

**Q-32. In case D2D services are permitted to be provided using the MSS frequency bands such as L & S bands, what should be the appropriate spectrum charging framework for such bands when utilized for provision of D2D satellite based services? Please provide detailed justification for your response, including the methodology for determination of such spectrum charges, if required.**

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**DCIF Response**

MSS in L & S bands is practically similar to D2D. Hence, the revenue share should be same as indicated in response to Questions above.

**Q-33. In case D2D services are permitted to be provided using the IMT spectrum assigned to the Service Authorised entity ('partnering entity') providing D2D satellite-based telecommunication services, should any additional spectrum charges be levied on the Service Authorised entity ('partnering entity') for use of IMT spectrum in the provision of satellite based D2D services? If yes, what should be the basis and quantum of such additional spectrum charges payable by the Service Authorised entity to the Government? In either case, please provide detailed justification for your response, including the detailed methodology for determination of such spectrum charges.**

**DCIF Response**

IMT Operators have got the Spectrum through Auction. Terms & Conditions of sharing Agreement between IMT Operator & SCN Operators should be left to them. No additional spectrum charges for such IMT Spectrum, However SCN operator should always keep record of usage of spectrum with locational information

**Q-34. In case spectrum is assigned to Satellite Communication Network (SCN) authorised entities, what should be the appropriate payment terms for spectrum charges payable by Satellite Communication Network (SCN) authorised entities? Please provide your response with justification.**

**DCIF Response**

Payment terms for spectrum charges should be simple and non-burdensome, can be similar to IMT Operators & IFMC Operators.

**Q-35. In case Minimum Spectrum Charges are to be applicable for SCN authorised entities, what should be the payment terms for the minimum spectrum charges for SCN authorised entities? Please provide your response with detailed justification.**

**DCIF Response**

Low minimum charges linked to spectrum management costs. Payment terms for



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spectrum charges should be simple and non-burdensome, and can be similar to IMT Operators & IFMC Operators.

**Q-36. What should be the minimum equity and minimum networth requirements for a Satellite Communication Network (SCN) authorised entity? Please provide detailed justification in support of your response.**

**DCIF Response**

Approx. INR 25–30 crore recommended. The minimum equity and minimum networth requirements should not be burdensome yet should be sufficient to keep the non-serious players away.

**Q-37. What should be the entry fee for proposed Satellite Communication Network (SCN) authorisation? Please provide detailed justification in support of your response.**

**DCIF Response**

Low entry fee to encourage growth.

**Q-38. What should be the rate of Authorisation Fee for a Satellite Communication Network (SCN) authorised entity? Please provide detailed justification in support of your response.**

**DCIF Response**

A small fraction of ~1% AGR to encourage the growth of this service, can be reviewed after 5 years.

**Q-39. Should a Minimum Authorisation Fee be applicable for the proposed SCN Authorisation? If yes, what should be the Minimum Authorisation Fee be for the proposed SCN Authorisation? Please provide detailed justification in support of your response.**

**DCIF Response**

Should be low to encourage the growth of this service, can be reviewed after 5 years..

**Q-40. What should be the appropriate payment terms & conditions for Authorisation Fees? Please provide detailed justification in support of your response.**



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**DCIF Response**

Simple and non-burdensome, can be similar to IMT Operators & IFMC Operators.

**Q-41. What should be the terms and conditions for Bank Guarantees, including both Performance Bank Guarantee (PBG) and Financial Bank Guarantee (FBG), for SCN authorised entities? Please provide detailed justification in support of your response.**

**DCIF Response**

Should not be onerous.

**Q-42. What should be the application processing fee for Satellite Communication Network (SCN) authorised entity? Please provide detailed justification in support of your response.**

**DCIF Response**

Approx. INR 50,000 recommended.

**Q-43. Apart from the financial provisions discussed earlier, are there any other financial terms and conditions that should be made applicable for the proposed Satellite Communication Network authorisation? Kindly provide a detailed response with justifications.**

**DCIF Response**

Light-touch approach; review after every 5 years as sector matures. there should be provision for technical audit fees to check compliance to security, operations, and financial audit.

**3. Conclusion**

The SCN framework should enable rapid growth through light-touch regulation while ensuring strong safeguards on security, routing sovereignty, data localisation, transparency, accountability and citizen safety. A phased Make in India roadmap, robust audit framework, meaningful and graded financial penalties and enforceable jurisdictional mechanisms for foreign operators are essential.

Vipin Tyagi  
Chairman, Technology Committee  
Digital Communication India Forum

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