

HCIPL/TRAI/CP 06/2026/1305

13<sup>th</sup> May 2026

**Advisor – NSL-II  
Telecom Regulatory Authority of India  
4th – 7th Floor, Tower-F  
World Trade Center,  
Nauroji Nagar, New Delhi – 110029**

Dear Sir,

**Sub : Submission of responses to TRAI Consultation Paper on the Framework for Satellite Communication Network Authorisation, and Assignment of Spectrum to Satellite Communication Network Providers.**

Ref : TRAI Consultation Paper - CP 06/2026, Dated 08-Apr-2026.

This is with reference to the consultation paper CP 06/2026, Dated 08-Apr-2026 floated by TRAI. In this regard, please find enclosed our responses herewith.

Thanking You,  
Yours truly

For Hughes Communication India Private Limited

Authorized Signatory

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## RESPONSES TO THE CONSULTATION PAPER

**Q1. 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.**

Hughes Response: Any Indian / foreign company should be eligible to apply for a license with a national level area of operations. The eligibility for foreign companies should be as per the prevailing FDI norms. The SCN Authorisation should follow the current Unified License regime guidelines.

**Q2. 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.**

Hughes Response: SCN Authorised entities should operate the satellite earth station Gateway and permitted to share or lease this network infrastructure with service licensee's like Comm VSAT authorization/SCNaaS. These operations must align with the technical and operational requirements specified under the respective service authorization regimes.

Furthermore, there must be clear accountability regarding service provision obligations, including full compliance with all security and data-related requirements.

**Q3. 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.**

Hughes Response: Clarity regarding the scopes of SCN & NSO, SCNaaS & VNO. Specifically, we would like to understand the implications for current VSAT (GSO) operators who maintain their own gateway infrastructure and also provide services directly to the end users.

Further, will SCN / SCNaaS supersede the recently proposed new Service Authorisations & Network Authorisation (SESG) regime from DOT.

**Q4. 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 & conditions ? Please provide a detailed response with justification.**

Hughes Response: The SCN authorized entities should deploy the necessary baseband equipment and infrastructure to provide access to service authorization holders (SCNaaS). Additionally, there should be a flexibility for service authorization holders to use their own baseband equipment's.

The control arrangement must be implemented on mutually agreed terms with service authorization holders in a manner to be compliant with independent regulatory obligations. This structure ensures an effective framework for lawful interception and security compliance.

**Q5. 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.**

Hughes Response: The proposed SCN authorization must comply with the Indian Space Policy – 2023 and the norms guidelines and procedures as per the (NGP).

**Q6. 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.**

Hughes Response: We believe there is no need to mandate reference agreement. Authorized entities should have the freedom to enter into commercial arrangements with one another, provided they remain responsible for meeting their respective regulatory obligations.

**Q7. 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.**

Hughes Response: These guidelines should be aligned with the current Unified License regime.

**Q8. Any other inputs or suggestions relevant to the proposed Satellite Communication Network authorisation may kindly provided with detailed justification.**

## Hughes Response:

The existing VSAT ecosystem plays a foundational role in India's enterprise and mission-critical communications landscape. Over decades, VSAT Service Providers (SPs) have built trusted, resilient, and regulation-compliant networks that continue to serve sectors where reliability, security, and nationwide reach are essential.

A balanced policy approach should recognize that existing VSAT Service Providers are not merely legacy operators, but critical ecosystem participants with proven operational capability, regulatory familiarity, and enterprise trust. Leveraging this established ecosystem can accelerate sectoral adoption of satellite connectivity while maintaining service reliability, national security alignment, and continuity for mission-critical users.

The current ecosystem supports highly sensitive and uptime-dependent use cases such as ATM connectivity, SCADA systems, oil & gas operations, emergency communications, border and remote-area connectivity. This operational credibility has been built through years of deployment experience in difficult environments.

Key aspects of the current ecosystem:

### **Serving Existing Enterprise Demand:**

Current VSAT operators already support a large installed base across banking, energy, mining, retail, logistics, government, disaster recovery. These networks are deeply embedded in operational workflows and are optimized for high availability and continuity.

**Strong Alignment with Indian Regulatory Framework:**

Existing VSAT SPs have evolved within India's licensing, security, lawful interception, spectrum coordination, and network governance requirements. This creates a mature operational ecosystem that is well aligned with national telecom and security objectives.

**Nationwide Ground Infrastructure and Ecosystem Investments:**

Existing operators have already invested significantly in gateways, hubs, network operations centers, compliance systems, field service networks, and trained manpower.

**Enabling a Stable and Orderly Transition to Next-Generation Satellite Connectivity:**

As new satellite technologies and constellations emerge, the existing VSAT ecosystem can act as a bridge between legacy enterprise requirements and future broadband architectures. Policy frameworks that incorporate and strengthen existing VSAT SPs can help ensure continuity, security, interoperability, and faster market adoption.

It appears from the current consultation paper on SCN & SCNaaS is going to simplify the licensing ecosystem for providing all types of Satcom services (FSS/MSS). Hence should be considered.

- Q9. **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.**

Hughes Response: Services from (a) to (c) should be permitted under SCN. We suggest the D2D services via satellite by using IMT spectrum should be examined after considering the outcome of WRC-2027

**Q10. 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.**

Hughes Response: We suggest the D2D services via satellite by using IMT spectrum should be examined after considering the outcome of WRC-2027.

**Q11. 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:**

<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>
<b>1</b>	<b>SCN authorised entity</b>	<b>SCN authorised entity</b>
<b>2</b>	<b>SCN authorised entity</b>	<b>Partnering entity (service provider)</b>
<b>3</b>	<b>Partnering entity (service provider)</b>	<b>SCN authorised entity</b>
<b>4</b>	<b>Partnering entity (service provider)</b>	<b>Partnering entity (service provider)</b>

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

Hughes Response: We recommend that spectrum for both Feeder & User links should be assigned to SCN, as it owns the Satellite & its associated infrastructure. Further, the SCN should be permitted to sell bandwidth to their partnering license such as SCNaaS, (Internet Service Provider in new service authorisation regime) and (Commercial CUG VSAT service provider under the existing UL regime).

**Q12. 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.**

Hughes Response: We suggest that spectrum for both FSS & MSS should be assigned to SCN authorized entities to enable comprehensive range of services.

Under this framework, SCN could partner with Access Service Providers within the new authorizations regime and GMPCS service providers under the existing UL regime for MSS. Similarly, for FSS, SCN could partner with Internet Service Providers in the new authorizations regime and VSAT service providers under the current UL regime.

**Q13. 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 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 GSObased 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.**

[Hughes Response: The satellite spectrum should be allocated on administrative basis as per the Telecom Act – 2023, for all type of Satcom services \(FSS / MSS\).](#)

**Q14. 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.**

[Hughes Response: No comments](#)

**Q15. 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.**

Hughes Response: The satellite spectrum should be allocated on an administrative basis as per the Telecom Act – 2023, for all types of Satcom services (FSS / MSS).

**Q16. 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.**

Hughes Response: A light-touch regulatory framework should be adopted which balances both, regulatory transparency and commercial flexibility.

**Q17. 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.**

Hughes Response: No comments.

**Q18. 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.**

Hughes Response: There should not be any separate policy/regulatory framework for using L / S band MSS spectrum for D2D services. MSS based D2D should be treated as part of existing MSS regime which avoids unnecessary fragmentation of spectrum regulation. Having a separate regulatory framework for MSS-based D2D would introduce artificial distinctions between handheld MSS, IoT-based MSS, and D2D-enabled MSS services, despite their shared spectrum and operational characteristics.

**Q19. 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 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.**

*Hughes Response: We suggest the D2D services via satellite by using IMT spectrum should be examined after considering the outcome of WRC-2027*

**Q20. 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.**

*Hughes Response: D2D satellite services are essential for extending connectivity to rural, remote and maritime regions where terrestrial connectivity is not available.*

*Establishing a regulatory clarity and timely enablement within the existing licensing framework is crucial to bridge the digital divide.*

**Q21. 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.**

Hughes Response: The satellite spectrum should be allocated on an administrative basis as per the Telecom Act – 2023, for all types of Satcom services (FSS / MSS).

**Q22. 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 utilisation 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 utilisation etc., which would form the basis of regulation? Please provide your response with justification.**

Hughes Response: We believe there is no need to regulate the charges between the SCN authorised entity and SCNaaS service authorized entity for the provision of SCNaaS. The current guidelines and licensing frameworks, the financial arrangements between VNOs and NSOs, including infrastructure sharing, revenue sharing, and access charges, should be left to the **mutual agreement** between the two parties.

**Q23. 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 utilisation of MSS spectrum assigned to the Service entity amongst other possible spectrum utilisation 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 utilisation etc., which would form the basis of regulation? Please provide your response with justification.**

Hughes Response: We suggest that regulation of charges under SCNaaS agreements supporting D2D services using MSS spectrum is not necessary as it will be supported by contractual safeguards and light-touch regulatory oversight, providing sufficient protection while enabling D2D services.

**Q24. 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 utilising spectrum for feeder link assigned to the service entity, besides utilising 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 utilisation etc., which would form the basis of such regulation? Please provide your response with detailed justification.**

Hughes Response: The Feeder-link network operations remain unchanged and operates irrespective of whether the user-link spectrum is MSS- or IMT-based. Since, SCN authorised entity's role remains network-oriented hence there is no justification for modifying or regulating SCNaaS charges.

**Q25. 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.**

Hughes Response: We suggest that the charges paid by the Service

Authorised entity SCNaaS (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) should be deducted from ApGR of the Service Authorised entity for the purpose of arriving at AGR for levy of License/ Authorisation as per the current Unified License-VNO guidelines.

**Q26. 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.**

**Q27. 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 Authorised 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.**

Hughes Response: DBN levy of 5% should be exempted from License Fee applicable for proposed SCN / SCNaaS Authorisations as the services will mostly be provided in un-served & under-served areas of the country. The VSAT service providers who are already serving the unserved/under served areas of the country should also get exemption of 5% DBN levy. This will reduce the service cost for end users and make services more affordable and will help in reducing the digital divide.

**Q28. In case FSS/MSS or any other spectrum is assigned to the Satellite Communication Network (SCN) authorised entities for provisioning of SCNaaS to Service authorised entities, what should be the broad financial terms & conditions of such an assignment?**

Hughes Response: DBN levy of 5% should be exempted from License Fee applicable for proposed SCN / SCNaaS Authorisations as the services will mostly be provided in un-served & under-served areas of the country. The VSAT service providers who are already serving the unserved/under served areas of the country should also get exemption of 5% DBN levy. This will reduce the service cost for end users and make services more affordable and will help in reducing the digital divide. The terms and conditions should be as per the current Unified License regime guidelines.

**Q29. 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.**

Hughes Response: We are of the view that it has been already deliberated between TRAI and DOT. Hence, we suggest that the DOT back reference to TRAI dated 12.11.2025 should be considered for Spectrum Charges.

**Q30. 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.**

Hughes Response: We are of the view that it has been already deliberated between TRAI and DOT. Hence, we suggest that the DOT back reference to TRAI dated 12.11.2025 should be considered for Spectrum Charges.

**Q31. 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.**

Hughes Response: We are of the view that it has been already deliberated between TRAI and DOT. Hence, we suggest that the DOT back reference to TRAI dated 12.11.2025 should be considered for Spectrum Charges.

**Q32. 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 utilised 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.**

Hughes Response: The satellite spectrum should allocated on administrative basis as per the Telecom Act – 2023, for all type of Satcom services (FSS / MSS).

**Q33. 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. No additional value-based spectrum charges should be levied on a**

**Hughes Response:** We suggest the D2D services via satellite by using IMT spectrum should be examined after considering the outcome of WRC-2027

**Q34. 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.**

**Hughes Response:** We are of the view that it has been already deliberated between TRAI and DOT. Hence, we suggest that the DOT back reference to TRAI dated 12.11.2025 should be considered for Spectrum Charges.

**Q35. 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.**

Hughes Response: A minimum spectrum charges could distort competition, and places a very high additional burden on smaller operators trying to provide satellite services. No minimum spectrum usage charges should be levied.

**Q36. 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.**

Hughes Response: A minimum spectrum charges could distort competition, and places a very high additional burden on smaller operators

**Q37. What should be the entry fee for proposed Satellite Communication Network (SCN) authorisation? Please provide detailed justification in support of your response.**

Hughes Response: We suggest this should be as per the prevailing Unified License regime guidelines.

**Q38. 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.**

Hughes Response: The authorisation or entry fee for a Satellite Communication Network (SCN) authorised entity should be established at a **low, proportionate level** featuring "reasonably light financial obligations. The rate should be strictly determined by a **transparent, cost-recovery model**. This means the fee must be designed solely to recover the actual administrative, technical, and regulatory costs incurred by the authority in

processing the application and managing compliance.

**Q39. 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.**

Hughes Response: The appropriate minimum authorisation fee should be determined strictly by an **administrative cost-recovery model**. High minimum fee places a very high additional burden on smaller operators trying to provide satellite services.

**Q40. What should be the appropriate payment terms & conditions for Authorisation Fees? Please provide detailed justification in support of your response.**

Hughes Response: No Comments

**Q41. 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.**

Hughes Response: Terms & Conditions should be as per the current Unified License regime guidelines.

**Q42. What should be the application processing fee for Satellite Communication Network (SCN) authorised entity? Please provide detailed justification in support of your response.**

Hughes Response: Terms & Conditions should be as per the current Unified License regime guidelines.

**Q43. 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.**

Hughes Response: DBN levy of 5% should be exempted from License Fee applicable for proposed SCN / SCNaaS Authorisations as the services will mostly be provided in un-served & under-served areas of the country. The VSAT service providers who are already serving the unserved/under served areas of the country should also get exemption of 5% DBN levy. This will reduce the service cost for end users and make services more affordable and will help in reducing the digital divide.