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**New Delhi**

**Sub: Comments of Indian Broadcasting & Digital Foundation (IBDF) on TRAI Consultation Paper dated 08 April 2026 on “Framework for Satellite Communication Network Authorisation, and Assignment of Spectrum to Satellite Communication Network Providers”**

Dear Sir,

At the outset, the Indian Broadcasting & Digital Foundation (“IBDF”) thanks the Telecom Regulatory Authority of India (“TRAI”) for providing stakeholders an opportunity to submit comments on the Consultation Paper dated 08 April 2026 on the “Framework for Satellite Communication Network Authorisation, and Assignment of Spectrum to Satellite Communication Network Providers” (“CP”).

IBDF is the apex representative body of television broadcasters in India, comprising leading news and non-news broadcasters across general entertainment, sports, movies, music, infotainment and other genres. IBDF members operate a significant majority of television channels in India and serve millions of households across the country through cable, Direct-to-Home (“DTH”) and other distribution platforms.

IBDF’s comments in the present consultation are limited to the potential impact of the proposed Satellite Communication Network (“SCN”) authorisation and spectrum assignment framework on the existing broadcasting and distribution ecosystem, particularly the use of C-band and Ku-band spectrum by television broadcasters, teleport operators, DTH operators and other related broadcasting services.

While the CP appears to be primarily directed towards new satellite communication network models, including LEO/MEO/NGSO systems, FSS, MSS and D2D services, several questions and discussions in the CP refer broadly to FSS spectrum, GSO-based FSS, spectrum charges, and the use of C, Ku and Ka bands. The CP itself notes that FSS is used for fixed-location services such as VSATs and teleports, and that C-band, Ku-band and Ka-band are commonly used for FSS. Accordingly, IBDF considers it necessary to place on record its concerns so that existing broadcasting, teleport and DTH operations are expressly protected from any unintended regulatory or financial spill-over.



## Preliminary Comments:

IBDF would like to provide its Introductory comments on the Consultation paper and its objectives.

- (a) Authorization Framework:** We note that the TRAI had previously given its recommendations on this issue (Recommendations on ‘the Framework for Service Authorizations to be Granted Under the Telecommunications Act, 2023 dated 18-Sept-2024). Primarily in these recommendations TRAI was of the view of separate Service Authorization for a;;Satellite-based Telecommunication Services .

“Authority recommended a separate service authorization for satellite-based telecommunication service in the country with reasonably light financial obligations including low entry fees.” Based on its analysis, TRAI conveyed to DoT that it “does not agree with the DoT’s prima facie view regarding removal of separate service authorizations for Satellite-based Telecommunication Service and M2M WAN Service”

We now note that the DoT wishes to review these recommendations and back references to provide authorization to Satellite Service Providers under the “ Main Service Authorizations category.” This implies a total change in the Auction based architecture for the Mobile cellular frequencies to be changed towards a new regime with the Satellite Communication Providers being able to use the entire FSS,BSS, L and S-Band spectrums. IBDF would like to convey its serious concerns on this development.

- (b) Disruption of National Framework for Telecommunications and Broadcasting as well as the NFAP for accommodation of foreign Players:** It is well known that the LEO and MEO operators as they exist today and are planned in the near future are all Foreign Satellite systems, and Primarily those from USA. Most of these systems have only approval of the FCC and not in accordance of ITU specified parameters. Many countries have permitted such systems just by following the FCC without any independent impact on their systems under the propaganda of cheap broadband in remote areas. The dimension of such systems is very large and the new proposals being placed before the FCC and getting approved with dire impacts well known on Astronomical, Broadcast and defense services.

We consider this re-consultation to be an attempt to fall in line with FCC permitted systems. The potential use of permission for Direct to Mobile ( i.e. using Terrestrial Frequencies for Cellular mobile) would typically require these foreign systems to participate in auctions for these limited resources. On the other hand, if these are administratively allocated it would be a violation of Supreme Court Guidelines.



**(c) Departure from ITU Mandated Structure for International Global Communications:**

ITU has raised serious concern on the very low orbit satellites of one the systems (Starlink) as these use the frequency bands of 12-12.7 GHz which is also used by the FSS broadcast sector in India and many ITU approved satellites use this band. Serious interference has been reported in this band as the LEO satellites proliferate. ITU has itself observed that the interference limits of FSS are exceeded by the LEO satellites.

**(d) No Independent Study has been Cited to Support the SCN Framework:** The Govt has not done its job of having an independent study done for the entire gamut of LEO systems and their implications on Broadband operators of India, FSS broadcast Ecosystem and Defense Ecosystems.

**(e) Presumption of Allocating L\_Band and S-Band Frequencies to Certain operators:**

There is a presumption on the Band that L-Band and S-Band currently held by certain organizations should be continued in its present form. However these organizations had access to these bands when these were Intergovernmental organizations.( i.e. Inmarsat) which were subsequently privatized and also acquired by other operators which now directly compete with DOS based systems. There are many Satellite systems which can provide such services and there is a need to have a wider selection via Auctions.

**Detailed Comments:**

**1. Broadcasting and DTH use of C-band and Ku-band must be expressly ring-fenced**

Television broadcasting in India depends critically on satellite spectrum. Broadcasters rely on satellite capacity, particularly in C-band, for distribution of television channels to Distribution Platform Operators (“DPOs”). DTH operators rely on Ku-band for direct delivery of television channels to subscribers.

These uses are part of a long-established permission-based, administratively managed and internationally coordinated satellite ecosystem. They are not comparable to exclusive terrestrial access spectrum used for mobile telecom services.

IBDF therefore submits that any framework for SCN authorisation and spectrum assignment must expressly clarify that:

- existing use of C-band and Ku-band by broadcasters, teleports, DTH operators and other related broadcasting services shall continue without disruption;
- such spectrum shall not be subjected to auction or exclusive assignment;
- no new SCN-linked spectrum charge, minimum spectrum charge, AGR-based charge or authorisation-linked levy should be imposed on existing broadcasting/DTH operations;
- existing MIB permissions, WPC/NOCC/SACFA processes, satellite capacity arrangements and ITU-coordinated usage should continue to apply; and
- no SCN-authorized entity should acquire any priority, exclusivity or gatekeeping right over spectrum or satellite capacity presently used for broadcasting and DTH services.



## **2. The Telecommunications Act, 2023 supports administrative assignment for broadcasting and listed satellite-based services**

IBDF submits that the statutory framework under the Telecommunications Act, 2023 itself recognizes that certain categories of spectrum use, including broadcasting and specified satellite-based services, are not to be assigned through auction.

Section 4 of the Telecommunications Act, 2023 provides that spectrum shall generally be assigned by auction, except in cases covered by the First Schedule, where assignment is to be undertaken through the administrative process. The CP reproduces the First Schedule, which expressly includes, inter alia:

- Public broadcasting services; and
- Certain satellite-based services such as Teleports, Television Channels, Direct to Home, Headend in the Sky, Digital Satellite News Gathering, Very Small Aperture Terminal, Global Mobile Personal Communication by Satellites, National Long Distance, International Long Distance, and Mobile Satellite Service in L and S bands.

This statutory position is directly relevant to the present consultation. It demonstrates the legislative intent that spectrum used for public broadcasting and listed satellite-based services should continue to be assigned through the administrative process and not through auction.

The CP also records DoT's clarification that where the use of spectrum falls within any entry of the First Schedule, assignment may be undertaken through the administrative process. DoT has further clarified that SCN-authorized entities seeking spectrum for services covered by Entry 16 may apply for administrative assignment.

Accordingly, IBDF respectfully submits that TRAI's recommendations in the present consultation should expressly preserve the statutory protection available to broadcasting and listed satellite-based services under the First Schedule. In particular, spectrum used for Teleports, Television Channels, DTH, HITS and DSNG should not be brought within any auction-based, exclusive-assignment or SCN-linked charging framework.

## **3. Satellite spectrum is materially different from terrestrial spectrum and should not be auctioned**

IBDF reiterates its earlier position submitted to TRAI in response to TRAI's Consultation Paper on Assignment of Spectrum for Space-based Communication Services dated 6 April, 2023 (*IBDF response dated 1 Jun 2023*) that satellite spectrum is materially different from terrestrial mobile spectrum. Terrestrial access spectrum is generally assigned exclusively within defined geographic boundaries. Satellite spectrum, however, is globally coordinated, shared and reusable, depending on satellite footprints, orbital locations and ITU coordination.



Broadcasting use of satellite spectrum is not based on exclusive allocation of scarce spectrum in the manner applicable to mobile telecom operators. Broadcasters do not receive exclusive blocks of spectrum comparable to terrestrial telecom spectrum. They use satellite capacity under an administratively managed and coordinated framework.

In its 2023 submission, IBDF had specifically highlighted that broadcasters rely on C-band for distribution of television channels to DPOs and that DTH operators use Ku-band to distribute television channels to subscribers. IBDF had also cautioned that any proposal to auction satellite spectrum traditionally used for broadcasting would create uncertainty for the satellite broadcasting ecosystem.

Auctioning or exclusively assigning C-band or Ku-band spectrum would artificially convert a shared technical resource into a scarce commercial resource. Such an approach would increase costs, create entry barriers, encourage hoarding and potentially allow large entities to become gatekeepers for smaller broadcasters, regional broadcasters, DTH operators and other users.

IBDF therefore submits that satellite spectrum used for broadcasting, DTH, teleport and other related services must continue to be assigned and managed administratively.

#### **4. No analogy should be drawn between new SCN/NGSO/D2D business models and legacy broadcasting usage**

The CP examines whether SCN-authorized entities should be permitted to provide services such as FSS, MSS and D2D, and whether FSS/MSS spectrum may be assigned to such entities. It also discusses the use of FSS spectrum for feeder links and user links in different SCN models.

IBDF submits that this framework should not be allowed to disturb existing broadcasting and DTH use cases. There is a clear distinction between:

- new satellite broadband, MSS, D2D, SCNaas and NGSO-based business models, including those involving LEO/MEO systems; and
- existing GSO/FSS broadcasting and DTH arrangements using C-band and Ku-band capacity under long-established permissions and international coordination.

Any attempt to apply a uniform spectrum-pricing, authorisation or financial framework across these fundamentally different use cases would be inappropriate and may impose unintended costs and uncertainty on the broadcasting sector.

#### **5. New SCN services must operate on a non-interference basis**

IBDF's concern is not only financial. It is also technical and operational.

C-band broadcasting has already faced interference-related concerns due to adjacent/nearby terrestrial mobile deployments. In its 2023 response, IBDF had specifically



flagged that interference between satellite-based services and terrestrial services could disrupt broadcasting and that further auction or reassignment of C-band frequencies could create artificial scarcity and operational difficulties.

Accordingly, IBDF submits that any new SCN, NGSO, MSS, D2D or satellite broadband service should be permitted only on a strict non-interference basis vis-à-vis existing broadcasting, DTH and teleport operations.

TRAI should recommend that:

- existing broadcasting and DTH operations in C-band and Ku-band shall receive priority protection;
- no new SCN/NGSO/MSS/D2D service should cause harmful interference to existing broadcasting/DTH services;
- before any new assignment in bands used by broadcasting/DTH, a transparent technical study should be conducted;
- any mitigation cost, including filters, technical modifications or operational changes, should be borne by the new entrant and not by broadcasters or DTH operators; and
- no change should be made to the current use of C-band/Ku-band by broadcasting/DTH services unless preceded by a full technical, economic and consumer-impact assessment.

## **6. SCN authorisation should not create gatekeeping or indirect spectrum trading**

The CP contemplates scenarios where an SCN-authorized entity may itself seek spectrum assignment or may use spectrum assigned to a partnering service-authorized entity. While such arrangements may be considered for new telecom satellite services, they should not affect existing broadcasting/DTH arrangements.

IBDF submits that no SCN framework should:

- require existing broadcasters, DTH operators or teleport operators to obtain services through SCN-authorized entities;
- permit SCN entities to control access to C-band or Ku-band capacity used for broadcasting/DTH;
- enable trading, leasing, warehousing or commercial monetisation of spectrum used for broadcasting services;
- disturb existing commercial arrangements between broadcasters, teleports, DTH operators and satellite operators; or
- create a new intermediary layer between broadcasters and satellite capacity providers.

## **7. No additional SCN-linked financial burden should be imposed on broadcasting/DTH services**

Chapter III of the CP discusses spectrum charges, AGR, minimum spectrum charges, authorisation fees and related financial conditions for SCN-authorized entities. IBDF submits that such financial obligations, if any, must be confined to new SCN-authorized telecom



satellite services and should not spill over to existing broadcasting, DTH or teleport operations.

IBDF specifically submits that:

- no auction price, market-linked spectrum charge, SCN spectrum charge, minimum spectrum charge, AGR-linked charge or authorisation-linked levy should be imposed on existing broadcasting/DTH use of C-band or Ku-band;
- existing administrative charges, if any, should not be increased as an indirect consequence of the SCN framework;
- downlinking or distribution of broadcast signals should not be subjected to any new spectrum assignment charge;
- payments made by broadcasters/DTH operators for satellite capacity, teleport services or content distribution should not be treated as a basis for SCN-related spectrum charges; and
- the cost of enabling new satellite broadband, D2D, MSS or SCNaaS models should not be passed on to the broadcasting sector.

## **8. Broadcasting serves a distinct public interest**

Television broadcasting remains one of the most accessible, affordable and widely used means of information, education, entertainment, news dissemination and emergency communication in India. Any disruption to C-band or Ku-band satellite operations would not only affect broadcasters and DTH operators, but also cable networks, smaller regional channels, public-interest channels and millions of television households.

In its earlier submission, IBDF had also emphasized that the use of satellite spectrum for broadcasting is linked to plurality, diversity of views and public access to information. A framework that increases cost, creates artificial scarcity or enables gatekeeping over satellite spectrum used for broadcasting would be contrary to the public interest.

## **9. Question-wise comments**

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

The SCN authorisation framework should contain an express saving clause that it does not apply to or disturb existing broadcasting, DTH, teleport and related satellite operations using C-band and Ku-band.

Suggested saving clause:

“Nothing in the SCN authorisation framework shall affect existing broadcasting, DTH, teleport, HITS, DSNG or other satellite-based services covered under the First Schedule to the Telecommunications Act, 2023. Such services shall continue to be governed by their existing permissions, licences, administrative assignment framework, WPC/NOCC/SACFA clearances and applicable MIB/DoT processes.”



**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.**

IBDF has no objection in principle to a separate SCN framework for new satellite communication services. However, FSS used for broadcasting/DTH must be treated separately from FSS used for satellite broadband, MSS or D2D services.

The inclusion of “FSS” in the SCN framework should not result in reclassification, additional authorisation, additional charging or regulatory disruption of legacy broadcasting/DTH operations.

**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.**

D2D services using IMT spectrum raise complex issues of interference, international coordination, device ecosystem, security and cross-border spill-over. Such services should not be permitted in any manner that may affect existing broadcasting/DTH satellite operations.

At minimum, D2D should be considered only after a separate technical consultation and after relevant international harmonisation.

**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>



2	SCN authorised entity	Partnering entity (service provider)
3	Partnering entity (service provider)	SCN authorised entity
4	Partnering entity (service provider)	Partnering entity (service provider)

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

For new SCN services, spectrum-holding combinations should be subject to safeguards against hoarding, trading and gatekeeping.

For existing broadcasting/DTH services, current arrangements should continue. Broadcasters, DTH operators and teleports should not be forced into any SCN-partnering model.

**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.**

If FSS spectrum is assigned to SCN entities for new telecom satellite services, such assignment must expressly exclude spectrum and satellite capacity used for broadcasting, DTH and teleport operations in C-band and Ku-band.

Any new assignment should be non-exclusive, administratively managed and subject to non-interference with existing users.



**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 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.**

TRAI's recommendations for NGSO-based FSS or GSO/NGSO-based MSS should not be applied to legacy GSO-FSS broadcasting/DTH use cases.

GSO-based FSS used for broadcasting/DTH is a distinct use case and should remain governed by the existing administrative and ITU-coordinated framework.

**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.**

Any SCN entity seeking FSS/MSS spectrum should be required to demonstrate:

- a. valid authorisation and security clearance;
- b. IN-SPACe/DoS approvals, wherever applicable;
- c. ITU coordination status;
- d. WPC/NOCC/SACFA compliance;
- e. technical non-interference with existing broadcasting/DTH operations; and
- f. no claim of exclusivity over C-band or Ku-band spectrum used by broadcasters, DTH operators, teleports and related services.



**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.**

Existing broadcasting/DTH users must be given priority protection. No new assignment should reduce availability, increase cost, create interference, or alter the commercial freedom of broadcasters/DTH operators to contract with satellite and teleport service providers.

**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.**

**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.**

Such agreements should be permitted only for new telecom satellite services and should not become mandatory for existing broadcasters, DTH operators or teleports.

They should not be used as a mechanism for indirect spectrum trading, commercial gatekeeping, or imposing additional intermediaries on the broadcasting sector.

**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.**



**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.**

These questions should be confined to telecom service providers and SCN entities. Charges paid by broadcasters, DTH operators or teleport operators for satellite capacity, teleport services or content distribution should not be brought within any AGR-based spectrum charging framework for SCN services.

**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?**

**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.**

**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.**

**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.**

**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.**

**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.**



**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.**

**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.**

No auction-based, market-linked, AGR-based or minimum spectrum charge should be imposed on existing broadcasting/DTH use of C-band and Ku-band.

If TRAI recommends any spectrum charges for SCN entities, such charges should apply only to new SCN-authorized telecom satellite services and must not be passed through to, or recovered from, legacy broadcasting, DTH or teleport operations.

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

**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.**

Any entry fee or authorisation fee for SCN entities should be limited to SCN entities. It should not be applied to broadcasters, DTH operators, teleport operators or existing permission-holders merely because they use satellite capacity in C-band or Ku-band.

## **10. Recommendations**

In view of the above, IBDF respectfully submits that TRAI should recommend as follows:

- Spectrum used for Public Broadcasting Services and satellite-based services listed in Entry 16 of the First Schedule to the Telecommunications Act, 2023 - including Teleports, Television Channels, DTH, HITS and DSNG - shall continue to be assigned only through the administrative process and shall not be subjected to auction;
- Existing C-band and Ku-band usage by broadcasters, DTH operators, teleports and related broadcasting services should be expressly protected;
- No additional SCN-linked spectrum charges, minimum charges, AGR-based levies or authorisation fees should be imposed on existing broadcasting/DTH/teleport usage;
- No SCN-authorized entity should be allowed to become a gatekeeper for access to C-band or Ku-band satellite capacity used by broadcasters or DTH operators;
- New SCN, NGSO, MSS, D2D or satellite broadband services should operate strictly on a non-interference basis vis-à-vis existing broadcasting/DTH operations;
- Any mitigation cost required to protect existing broadcasting/DTH operations should be borne by the new entrant and not by broadcasters/DTH operators;



- No change affecting C-band or Ku-band broadcasting/DTH satellite operations should be recommended without a separate consultation with MIB, IBDF, broadcasters, DTH operators, teleport operators, satellite operators and technical experts; and
- TRAI should conduct a detailed technical, economic and consumer-impact study before recommending any framework that may affect C-band or Ku-band broadcasting operations.

IBDF once again thanks TRAI for the opportunity to submit its comments and would be pleased to provide any further inputs required by the Authority.

Yours faithfully,

A handwritten signature in blue ink, reading "Avinash Pandey", is positioned above the printed name.

**Avinash Pandey**  
Secretary General & CEO