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Response to the Consultation Paper on Satellite Communication Network (SCN) Authorisation Framework

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Myriota Pty. Ltd. (Myriota) welcomes the opportunity to make submissions in response to the Consultation Paper on the Framework for Satellite Communication Network Authorisation and the Assignment of Spectrum to Satellite Communication Network Providers (the Consultation Paper) and sets out below its position on the questions raised therein.

1. 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.

1.1. Validity Period

Myriota recommends a validity period of 10 years for SCN authorisation. Satellite communications systems have inherently long investment and deployment cycles, typically requiring several years to launch a constellation, establish infrastructure, and generate initial revenues. A 10-year term provides the planning horizon necessary to justify substantial capital expenditure and enables amortisation of investment while offering flexibility to reassess and update technology. A term of 20 years or more would be excessive without milestone reviews, as demonstrated by the EU's 2 GHz MSS experience where 30 MHz of valuable spectrum remained largely unused for nearly two decades despite having been licensed to operators.

Milestone reviews should be incorporated at defined intervals during the 10-year term to verify deployment progress, technical performance, and compliance with national policy objectives.

1.2. Eligibility

Eligibility conditions must be proportionate to the type and scale of service. Overly prescriptive financial or technical thresholds risk excluding SMEs and innovative operators, particularly those providing narrowband IoT or low-data-rate NGSO (Non-geostationary orbit) services. Myriota urges TRAI to adopt technology-neutral eligibility criteria that do not systematically favour large broadband operators over IoT-focused NGSO operators.

International evidence demonstrates that high per-terminal fees or complex eligibility requirements have rendered IoT satellite deployment commercially non-viable in some jurisdictions. A proportionate, network-level authorisation approach is essential.

1.3. Scope

The SCN authorisation should expressly cover NGSO LEO (low-earth orbit) operators providing IoT and data services in sub-1 GHz VHF and UHF MSS bands, and in the 2 GHz S-band MSS allocation. It should not be limited to broadband or voice satellite services.

Australia's regulatory model provides a useful reference: satellite service operators are not required to hold a prior licence to provide services as a Carriage Service Provider. This light-touch approach significantly reduces barriers to market entry without compromising oversight.

2. Q2 Terms and conditions for SCN authorisation (general, technical, operating, security)

2.1. Light-Touch Regulation

The most successful innovation-oriented jurisdictions employ straightforward licensing with minimal administrative overhead. The European Union has for decades operated under a general authorisation regime allowing electronic communications networks and services to operate subject only to general conditions, without preliminary authorisation procedures. Australia similarly does not require satellite operators to hold a prior licence as a Carriage Service Provider. TRAI should adopt an analogous approach for the SCN framework.

2.2. “Use-It-or-Lose-It”

SCN authorisation conditions should require active deployment within a defined period. Spectrum assigned but not deployed within a reasonable timeframe (e.g. 24–36 months) should be subject to regulatory review and potential reallocation. This prevents spectrum hoarding and ensures resources remain productively available to the market.

2.3. Processing Timelines

TRAI should commit to processing all SCN authorisation applications within a maximum of 90 days. Prolonged uncertainty creates investment risk, delays network rollout, and disadvantages operators in fast-moving markets. Without defined timelines, operators face prolonged periods of uncertainty that hinder both investment and deployment.

2.4. IoT-Specific Conditions

Roll-out conditions for IoT-focused narrowband operators should be distinct from those applicable to broadband or voice service providers. Specifically: extended deployment timelines aligned with IoT's modular commercial rollout; proportionate penalties that do not impose excessive financial burdens on SMEs; and simplified compliance verification processes appropriate to IoT's low-data-rate, low-duty-cycle operational nature.

2.5. Interference Management

India should establish a single empowered department with authority to rapidly identify and deactivate sources of interference. The ITU-RR framework provides a useful international baseline but is insufficient alone for national-level interference resolution.

Rather than punitive measures, the focus should be on rapid identification and deactivation of interfering transmitters.

2.6. Flexibility for IoT Operators

The SCN framework should permit IoT-focused operators to be exempted from conditions that do not apply to their service type. For example, providers of low-bandwidth, high-latency satellite IoT services may reasonably be exempted from emergency call routing obligations given the nature of their service. The EU's general authorisation model provides precedent for such targeted exemptions.

3. Q8 Any other inputs or suggestions relevant to the proposed SCN authorisation

3.1. Regulatory Sandboxes

For early deployment of new NTN (Non-Terrestrial Networks) service types, Myriota recommends that TRAI consider establishing regulatory sandboxes enabling controlled pilot projects prior to full commercial licensing. Such sandboxes would allow operators to conduct shared trials of IoT, D2D, and A2G applications within a defined framework, generating empirical evidence on interference management, spectrum sharing feasibility, and market uptake to inform subsequent regulatory decisions.

4. Q9 Which services should be permitted on SCNs? (FSS / MSS / D2D-MSS / D2D-IMT)

4.1. MSS — Sub-1 GHz (IoT and Narrowband Applications)

Myriota strongly supports permitting MSS in the sub-1 GHz UHF and VHF bands. These bands carry ITU primary or co-primary NGSO MSS allocations and provide an ideal balance of penetration, reliability, and bandwidth efficiency for IoT connectivity in remote and rural environments. The specific bands are: 399.9–400.05 MHz (Earth-to-space, ITU primary); 400.15–401 MHz (space-to-Earth, co-primary); 137–138 MHz (space-to-Earth); 148–150.05 MHz (Earth-to-space).

4.2. MSS — 2 GHz S-Band (IoT NTN and D2D)

The paired 1980–2010 MHz uplink / 2170–2200 MHz downlink S-band allocation is standardised under 3GPP Release 17 NTN for both IoT and D2D applications, ensuring global interoperability and integration with terrestrial 5G networks. The S-band provides robust propagation in mobile and partially obstructed environments, avoids rain fade and high terminal costs associated with Ku- and Ka-band, and supports compact antennas suitable for IoT and industrial devices.

4.3. D2D via MSS Spectrum

Myriota supports permitting D2D services using MSS spectrum (including L-band and S-band), provided these are treated as one of several complementary NTN service layers alongside IoT NTN and air-to-ground services — not as the exclusive or primary use. The 2 GHz MSS band should not be reserved exclusively for D2D. IoT NTN services can operate in channels as small as 300 kHz with negligible interference to broadband D2D systems, enabling efficient coexistence in shared-spectrum regimes.

5. Q10 Should D2D via IMT spectrum be permitted now, or await WRC-2027?

Myriota recommends that any decision to permit D2D via IMT spectrum be deferred pending the outcome of WRC-2027. Studies on the use of IMT spectrum for NTN-D2D are still progressing within international standardisation bodies, and it remains premature for national administrations to assign this spectrum exclusively for D2D deployment at this stage. India should avoid locking spectrum into a single service type before technical and regulatory frameworks at the international level have matured. The EU's 2 GHz MSS experience — where spectrum was exclusively licensed but remained largely unused for nearly two decades — provides a cautionary precedent against premature exclusive allocations.

Instead, Myriota recommends that TRAI consider establishing a regulatory sandbox to enable controlled pilot projects for D2D via IMT spectrum, generating empirical evidence before a full commercial licensing decision.

6. Q12 Which spectrum types (FSS / MSS / other) should be assigned to SCN entities?

6.1. Sub-1 GHz MSS (UHF / VHF)

Primary NGSO MSS allocations essential for direct-to-orbit IoT connectivity:

- 399.9–400.05 MHz — Earth-to-space (ITU primary allocation exclusively for MSS)
- 400.15–401 MHz — space-to-Earth (co-primary with Meteorological Aids, Meteorological-Satellite, and Space Research Services)
- 137–138 MHz — space-to-Earth
- 148–150.05 MHz — Earth-to-space

6.2. 2 GHz S-Band MSS

1980–2010 MHz (uplink) / 2170–2200 MHz (downlink) — standardised under 3GPP Release 17 NTN for IoT and D2D.

Australia's ACMA has already established a dedicated 5 MHz sub-allocation for satellite IoT in this band, recognising IoT as a legitimate MSS use case alongside emerging NTN applications.

6.3. Gateway / Feeder Link Bands

2025–2110 MHz, 2200–2290 MHz, and 8025–8400 MHz are commonly used by NGSO satellite operators for gateway communications. These are essential to the functioning of NGSO satellite systems. TRAI should consider lighter compliance obligations and a simplified access process for these feeder link frequencies.

7. Q13 Policy and regulatory framework for FSS/MSS spectrum assignment to SCN entities

7.1. NGSO FSS and GSO/NGSO MSS

Myriota confirms that TRAI's recommendations of 09.05.2025 on 'Terms and Conditions for the Assignment of Spectrum for Certain Satellite-Based Commercial Communication Services' (read with TRAI's response of 08.12.2025 to DoT's back-reference) should serve as the basis for the SCN spectrum assignment framework, subject to the following modifications:

- 10-year validity with milestone reviews: Consistent with Myriota's previous TRAI submission and its Ofcom submission. Milestones should verify deployment progress and coverage.
- Single-system licensing for NGSO: NGSO constellations should be licensed as a single system, not per ITU filing. This eliminates redundant documentation, reduces administrative burden, accelerates deployment, and allows operators to add satellites under an existing licence without sequential approvals.
- IoT-specific carve-out: Explicit provisions for narrowband IoT operators including lighter roll-out conditions, proportionate penalties, and simplified compliance verification.
- Light compliance for gateway frequencies: Simplified access regime for 2025–2110, 2200–2290, and 8025–8400 MHz.
- International benchmarking: Australia's Space Object Class Licence (blanket authorisation for all earth stations, regardless of number); Germany's EUR 157.50 flat annual fee for narrowband IoT networks (<15 MHz); Chile's zero terminal fee (Decree 160/2023); and Colombia's flat USD 2,296 for unlimited terminals all provide relevant precedents for calibrating the SCN framework.

8. Q14 Eligibility conditions for seeking administrative assignment of FSS/MSS spectrum by proposed SCN entities

Eligibility for spectrum assignment to SCN entities should reflect the following principles:

- Network-level authorisation: Eligibility and spectrum assignment should be assessed at the constellation or network level, not per satellite or per terminal. Per-apparatus licensing is commercially incompatible with IoT deployments requiring thousands to millions of low-power user terminals. Australia's Space Object Class Licence model — blanket authorisation for all earth stations in a network once space-side licences are obtained — is the appropriate international reference.
- Proportionate financial thresholds: Minimum equity and networth requirements must be calibrated to the scale of service. IoT-focused narrowband NGSO operators have fundamentally different cost structures from broadband satellite operators. High thresholds calibrated for broadband operators create unnecessary entry barriers for innovative IoT providers.
- Technical eligibility: Applicants should demonstrate ITU coordination status and compatibility with incumbent satellite systems. CEPT ECC Report 322 provides a useful intra-service compatibility methodology, though it should not be treated as exhaustive proof of coexistence.
- Processing timeline: Maximum 90-day processing period. Prolonged uncertainty creates investment risk and delays deployment of connectivity services.
- SME accessibility: Eligibility conditions must not systematically exclude smaller operators. Streamlined criteria lower entry barriers and support a more competitive SCN market.

9. Q15 Any other inputs or suggestions relevant to FSS/MSS spectrum assignment to SCN entities

- Regulatory sandboxes: For early deployment in new frequency bands (including the 2 GHz S-band), TRAI should consider establishing regulatory sandboxes to enable controlled pilot projects before full commercial spectrum assignment.

- ITU coordination: All new entrants in the sub-1 GHz MSS bands must complete ITU frequency coordination with existing systems before commencing operations. The complexity of coexistence increases significantly with a third system in already-congested UHF and VHF bands.

10. Q18 Framework for D2D service via satellite using MSS spectrum (L-band and S-band)

Myriota supports establishing a framework for D2D services via MSS spectrum (including L-band and S-band), provided that this framework treats D2D as one of several complementary service layers — alongside IoT NTN and A2G — rather than the exclusive primary use of the band.

Key principles:

- Complementary services: IoT NTN, D2D, and A2G services in the MSS band are complementary, not competing. All should be permitted within the SCN framework. Exclusive allocation to D2D alone risks repeating the EU's 2 GHz MSS experience of two decades of underutilisation.
- Technical coexistence: IoT services in the S-band can operate in channels as small as 300 kHz with short burst transmissions (up to 262 ms) and very low duty cycles (approximately 0.02% per day). This enables efficient coexistence with broadband D2D or A2G systems in a shared-spectrum regime without exclusive allocation.
- Light-touch licensing for IoT NTN: Within any D2D-MSS framework, narrowband IoT NTN operators should benefit from a tiered light-licensing regime with lower administrative and financial barriers. Spectrum fees should be assessed at the network or system level, not per terminal.
- WRC-2027 alignment: The D2D-MSS framework should be designed to remain compatible with emerging international standards from WRC-2027 and 3GPP Release 17/18 NTN standardisation.

11. Q19 D2D via IMT spectrum — multi-part question (framework, bands, NFAP, cross-border interference, LSA method)

11.1. Framework — Need and Timing

A policy and regulatory framework for D2D via IMT spectrum is premature at this stage. International studies on NTN-D2D using IMT spectrum are still in progress. A regulatory sandbox approach — enabling controlled pilot trials before full commercial licensing — is recommended as an intermediate step. This allows India to gather empirical evidence on interference management and service performance without locking spectrum prematurely.

12. Q20 Any other inputs on D2D services via satellite through SCNs

- Complementarity with IoT: The SCN framework must ensure that the emergence of D2D satellite services does not displace or disadvantage existing IoT-NTN services in the same bands. Both serve distinct user needs and can coexist within shared-spectrum frameworks with appropriate technical conditions.

13. Q28 Broad financial terms and conditions for spectrum assignment to SCN entities

13.1. Validity and Milestones

Spectrum assignment to SCN entities should be for 10 years with milestone reviews at defined intervals to verify technical performance, coverage commitments, and compliance with national policy objectives. A shorter term would not provide sufficient investment certainty for satellite systems.

13.2. Fee Structure — Approach and International Benchmarks

Spectrum fees for SCN entities should be structured to actively incentivise early market entry and innovation, not merely to recover regulatory costs. Myriota submits that the appropriate approach is a two-stage model. In the initial deployment phase, spectrum fees should be waived entirely. Removing the financial burden of spectrum charges at the outset lowers barriers to entry, encourages infrastructure investment, and signals a genuine regulatory commitment to growing the satellite communications sector in India. Following the initial deployment phase, fees should transition to a modest fixed amount, calibrated by reference to the type and scale of service — not linked to revenue in any form.

This approach is particularly important for IoT satellite service providers. IoT operators typically work on narrow margins with large numbers of low-cost connected devices. Unlike broadband operators, they cannot readily absorb variable or unpredictable charges. Critically, any cost imposed on the operator does not remain with the operator — it is passed through directly to subscribers and end users. These are often the farms, utilities, remote communities, and small enterprises that India's digital inclusion objectives are designed to connect. Keeping fees fixed and modest, and waiving them entirely at the outset, directly protects the affordability of IoT connectivity for those end users.

The following international comparisons are relevant benchmarks for calibrating post-deployment fixed fees:

- Germany (BNetzA): EUR 157.50 annual flat fee for a narrowband IoT satellite network using less than 15 MHz in total.
- Chile: Zero spectrum fee for IoT satellite terminals (Decree 160/2023) — a tiered approach that treats IoT terminal spectrum as fee-exempt while maintaining oversight through type-approval.
- Colombia: Flat USD 2,296.38 annual fee authorising an unlimited number of terminals regardless of bandwidth used.

These benchmarks demonstrate that fixed and very low fees are workable, internationally recognised approaches to spectrum management, and that fee waivers for IoT-type services are compatible with effective oversight. TRAI should use these comparisons to calibrate appropriate fixed fee levels for the post-deployment phase of the SCN framework.

14. Q29 Should SCN spectrum charges follow the 09.05.2025 recommendations framework? What is the appropriate charging framework?

Myriota supports applying the spectrum charging framework from TRAI's recommendations of 09.05.2025 to SCN authorised entities, subject to the fundamental modification set out below.

14.1. Preferred Methodology: Fixed Fees, Not Revenue-Linked Charges

Myriota submits that spectrum charges for SCN entities should be structured as fixed fees calibrated to the type and scale of service, and must not be linked to revenue in any form. Revenue-linked charges — whether calculated as a percentage of adjusted gross revenue

or any other revenue metric — are unpredictable, difficult to administer for early-stage operators, and create a perverse disincentive to commercial growth at precisely the moment operators most need to reinvest. A fixed-fee structure, by contrast, gives operators clear and stable cost expectations from the outset, enabling confident long-term investment decisions.

14.2. Fee Waiver in the Initial Deployment Phase

During the initial deployment phase, spectrum fees should be waived entirely. Removing the financial burden of spectrum charges at the outset directly lowers the barrier to entry, encourages investment in satellite infrastructure, and sends a clear regulatory signal that India is open for business in the satellite IoT sector. This is particularly important for narrowband IoT operators, which generate little or no revenue while building out their constellation and device ecosystem. Requiring fees before an operator has established a subscriber base imposes cost at the point of highest financial risk and lowest public benefit.

14.3. Post-Deployment Fixed Fees Based on Service Scale

Following the initial deployment phase, fees should transition to a modest, fixed annual amount calibrated by reference to the type and scale of service. Fees for narrowband IoT and low-data-rate NGSO services should be materially lower than those for broadband satellite operators, reflecting the fundamental differences in cost structure, revenue base, and bandwidth utilisation between these service types. All fees should be assessed at the network or system level — not per terminal, per satellite, or per MHz. TRAI should set specific fee amounts by reference to the international benchmarks set out under Q28 and the documented costs of domestic spectrum management, without reference to operator revenues.

14.4. Why Fixed Fees Matter for IoT Operators and Their Subscribers

For IoT satellite service providers, regulatory costs are not absorbed by the operator — they are passed through directly to subscribers and end users. These are often the farms, utilities, remote communities, logistics operators, and small enterprises that India's digital inclusion and connectivity objectives are designed to reach. Every element of regulatory overhead makes IoT connectivity marginally less affordable and less commercially viable to deploy in the remote and rural areas where it is needed most. A fixed-fee structure, set at a genuinely modest level and waived entirely during the initial deployment phase, keeps the cost of IoT connectivity within reach for those end users and makes large-scale deployment economically viable in the first place.

14.5. IoT Carve-Out

The fixed-fee framework must be designed so that fees applicable to narrowband IoT satellite services are materially lower than those applicable to broadband SCN operators. Spectrum charges must not act as a barrier to IoT satellite deployment. Chile's zero terminal fee model and Colombia's flat unlimited-terminal fee both demonstrate that effective spectrum management objectives can be achieved without per-device charges or revenue-linked fees.

15. Q31 If not AGR-based, what alternative spectrum charging mechanism should apply to SCN entities?

Myriota's primary recommendation, as set out under Q29, is a fixed-fee structure calibrated to service type and scale, with fees waived entirely during the initial deployment phase. This approach is itself the preferred alternative to both revenue-linked and per-

MHz charging. If TRAI determines not to adopt a fixed-fee structure, Myriota submits that the following principles must be maintained under any alternative framework:

- Fees must be assessed at the network/system level, not per terminal or per MHz.
- For narrowband IoT networks (<15 MHz total bandwidth), a nominal annual flat fee comparable to Germany's EUR 157.50 would provide regulatory oversight without creating IoT deployment barriers.
- Per-terminal fees are fundamentally incompatible with IoT deployment economics. A single IoT satellite operator may deploy hundreds of thousands of terminals; per-terminal fees have been demonstrated to render IoT business models commercially non-viable in jurisdictions such as Malaysia.
- Chile's zero-terminal-fee model demonstrates that spectrum management objectives can be achieved without per-device charges, focusing regulatory oversight on network-level licensing and type-approval certification.

16. Q36 Minimum equity and networth requirements for SCN authorised entity

Myriota submits that minimum equity and networth requirements must be proportionate to the type and scale of service offered. IoT-focused narrowband NGSO operators have fundamentally different cost structures from broadband satellite operators, and requirements calibrated only for large operators create unnecessary barriers for innovative IoT providers and SMEs. International evidence demonstrates that overly high financial entry thresholds have prevented affordable and beneficial IoT connectivity solutions from reaching underserved areas. Requirements should be set at the lowest level consistent with ensuring financial viability and the ability to meet regulatory obligations.

17. Q37 Entry fee for SCN authorisation

Myriota submits that the entry fee for SCN authorisation should serve as an administrative cost-recovery mechanism only, not as a revenue-raising instrument or a market filter. In particular, where the applicant is an IoT-focused narrowband SCN operator, the entry fee should be waived entirely or set at a nominal fixed amount, so as not to impose an upfront financial barrier at the most capital-intensive stage of an operator's development.

Where an entry fee is charged, it should:

- (a) be assessed at the system/network level, not per satellite or per terminal;
- (b) be proportionate to the type of service (IoT/narrowband vs broadband);
- (c) be a fixed amount, not linked to projected revenues or spectrum bandwidth; and
- (d) not act as a barrier to entry for innovative operators. International comparisons for fixed annual licensing fees:

- Germany (BNetzA): EUR 157.50 annual flat fee for narrowband IoT satellite network (<15 MHz).
- Chile: Zero terminal spectrum fee for IoT satellite services.
- Colombia: Flat USD 2,296.38 annual fee, unlimited terminals.

18. Q39 Should a Minimum Authorisation Fee apply? If so, what level?

Myriota submits that the appropriate minimum authorisation fee for IoT-focused SCN operators during the initial deployment phase is zero — consistent with the fee waiver approach proposed under Q28, Q29, and Q37. Requiring a minimum fee before an

operator has established a subscriber base or revenue stream places a financial burden at precisely the most vulnerable point in the deployment lifecycle and is counterproductive to the policy objective of promoting market entry and innovation.

Following the initial deployment phase, if a minimum authorisation fee is considered necessary, it should: be a fixed amount assessed at the network level; be materially lower for narrowband IoT operators than for broadband satellite services; and be set by reference to the documented costs of administering the SCN authorisation framework, not by reference to operator revenues. Germany's EUR 157.50 annual fee for narrowband IoT networks and Chile's zero terminal fee both demonstrate that effective spectrum oversight does not require significant minimum fees. Any minimum must be assessed at the network level, not per terminal or per MHz.

19. Q41 Terms and conditions for Bank Guarantees (Performance Bank Guarantee and Financial Bank Guarantee) for SCN authorised entities

Myriota submits that the terms and conditions for both the Performance Bank Guarantee (PBG) and the Financial Bank Guarantee (FBG) must be strictly proportionate to the type, scale, and revenue profile of the service offered by the SCN authorised entity. Bank guarantee requirements that are calibrated for large broadband satellite operators will act as an artificial barrier to entry for SMEs and narrowband IoT-focused NGSO operators, whose cost structures and revenue bases are fundamentally different from those of high-capacity commercial satellite systems.

Myriota proposes that TRAI adopt the following principles in designing the PBG and FBG framework for SCN entities:

- Proportionality to service type: The quantum of both the PBG and FBG should be determined by reference to the nature and scale of the service authorised under the SCN framework, not by a single uniform figure applied across all operators. A tiered structure should apply, with materially lower guarantee amounts for narrowband IoT and low-data-rate NGSO operators compared to broadband satellite service providers.
- No barrier to SME entry: Bank guarantee conditions must not function as a de facto exclusionary mechanism preventing smaller operators and innovative start-ups from obtaining SCN authorisation. The TRAI has itself recognised in the context of roll-out obligations that proportionate conditions are necessary to foster a more inclusive market environment. The same principle applies with equal force to financial security instruments.
- Performance Bank Guarantee (PBG): The PBG should be linked solely to the specific roll-out milestones applicable to the SCN entity's authorisation. For IoT-focused NGSO operators subject to lighter roll-out conditions and extended deployment timelines (as recommended under Q2 and Q14), the corresponding PBG amount should reflect those reduced obligations — not the more onerous milestones applicable to broadband operators.
- Financial Bank Guarantee (FBG): The FBG should be calibrated by reference to the expected spectrum charges and authorisation fees payable by the entity, taking into account the fixed-fee charging framework proposed under Q29 and Q38. For IoT-focused narrowband operators, the FBG should be set at a correspondingly modest level that does not lock up disproportionate capital during the initial deployment phase.
- Periodic review: Both the PBG and FBG amounts should be subject to review at each milestone review point during the 10-year SCN authorisation term, with adjustments

made to reflect actual deployment progress, verified spectrum usage, and any changes to the operator's revenue base. This ensures that financial security instruments remain proportionate throughout the authorisation period rather than being fixed at levels appropriate only to initial deployment.

Myriota remains committed to working constructively with TRAI to develop a regulatory framework that supports innovation, promotes digital inclusion, and ensures efficient and equitable use of India's spectrum resources.

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