NEWS BROADCASTERS & DIGITAL ASSOCIATION
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Only by Email < advmn@trai.gov.in >

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Subject: NBDA Comments on Consultation Paper dated 08th April 2026 on "Framework for Satellite Communication Network Authorisation, and Assignment of Spectrum to Satellite Communication Network Providers"

Dear Sir,

The News Broadcasters & Digital Association (NBDA), formerly known as the News Broadcasters Association (NBA) is an association of 24x7 television broadcasters and digital media entities/platforms that broadcast and/or publish news and current affairs programmes and content. NBDA represents several important and leading national and regional private news and current affairs broadcasters that operate news channels and digital platforms in Hindi, English, and regional languages.

NBDA submits these comments in response to TRAI's Consultation Paper dated 08.04.2026 on the "Framework for Satellite Communication Network Authorisation and Assignment of Spectrum to Satellite Communication Network Providers" (hereinafter the "Consultation Paper").

At the outset, prior to submitting its comments, NBDA would like to express its appreciation for TRAI's decision to grant a one-week extension for the submission of comments, following the stakeholders' request.

NBDA is not substantively responding to the Consultation Paper, except to the narrow and limited extent of seeking protection for the existing broadcasting and distribution ecosystem, particularly the use of the C-band and Ku-band by broadcasters, teleport operators, DTH operators, Digital Satellite News Gathering (DSNG), and other related services.

While it is understood that the aforementioned legacy users are not the subject of the present Consultation Paper, which appears to be primarily concerned with new satellite communications network models, at several instances, reference is made in the Consultation Paper to Fixed Satellite Service (FSS) Spectrum, including Geostationary Satellite Orbit (GSO)-based FSS, C, Ku, and Ka bands. NBDA therefore requests that TRAI ensure that the Satellite Communication Network (SCN) framework recommended as a result of this consultation process does not adversely affect existing broadcasting, teleport, and Direct-to-Home (DTH) operations. In this regard, it may be relevant to note as follows:

1. At present, the majority of LEO and MEO operators are Foreign Satellite Systems, with the overwhelming majority being incorporated in the United States of America. As far as the use of spectrum for supplemental coverage and Direct-to-Device (D2D) is concerned, the Consultation Paper draws heavily on practices in other countries, which, in turn, were influenced by the Federal Communications Commission (FCC) framework. The liberalized FCC framework was designed to facilitate its own domestic industry and serve American consumers. However, many countries permitted such a system with the intention of facilitating consumers, particularly those in rural, unserved, and

underserved areas, by providing cheap broadband, without undertaking any independent impact assessment on their systems.

TRAI should not follow the FCC approach without undertaking its own independent assessment. Before considering such systems and making recommendations, the Government should conduct an independent study of the full gamut of LEO systems and their impact, inter alia, on broadband operations, FSS broadcasting, and the defense ecosystem.

2. Further, in view of increasing geopolitical sensitivities and the strategic importance of media dissemination infrastructure, India should exercise caution before permitting excessive dependence on foreign-controlled satellite communication ecosystems for the dissemination of news and public information. Adequate policy safeguards may be considered necessary in this regard.

3. As noted in the Consultation Paper itself, Word Radiocommunication Conference -27 (WRC-27), is expected to examine, under Agenda Item 1.13 of International Telecommunication Union (ITU) Radio Regulations, the possibility of new allocations to Mobile Satellite Service (MSS) in IMT Frequency Bands. Such deliberations may provide an appropriate spectrum management framework for D2D services by using the spectrum in IMT frequency bands. Therefore, it may be prudent to await such deliberations. In particular, the band of 7.125 to 7.4 GHz (Upper Mid Band) has been permitted by the FCC for use by LEO systems for 6G services. The concern is that if foreign operators are permitted to operate in this band, the same may not be available for indigenous systems.

4. Under Article 22 of the ITU Radio Regulations, ITU has established permissible levels of interference into GSO networks from Non-Geostationary Satellite Orbit (NGSO) systems by requiring NGSO systems to comply with Equivalent Power Flux-Density (EPFD). The very low orbit satellites of one of the NGSO systems, Starlink, use the 12-12.7 GHz frequency band, which is precisely the band used by the FSS broadcast sector in India and by other ITU-approved satellites. As the LEO satellites proliferate, serious interference has been reported in this band. In some cases, interference from LEO satellites has been reported to exceed EPFD limits, raising concerns about potential degradation of service quality for GSO-based satellite TV.

5. The Indian broadcasting industry is dependent on satellite spectrum for Uplinking and Downlinking of broadcast signals. Broadcasters rely predominantly on the C-band for uplinking and downlinking, while DTH operators deliver TV channels to subscribers using the Ku-band. These bands are assigned by the ITU and are internationally coordinated.

6. At present, there are around 200 million TV households and around 900+ registered TV channels which are uplinked/downlinked using satellites through the C-Band spectrum, and around 2000 registered DPOs who re-transmit the same post reception from the satellites. DTH systems are one of the major delivery systems for the broadcast of linear channels, serving millions of viewers in rural and urban households, and constitute a major source of their entertainment and information. The sector provides employment to over 2 million people.

7. Therefore, while making any recommendations concerning the framework for SCN authorisation and assignment of spectrum, TRAI should ensure that an explicit carve-out is included to ensure that the SCN authorisation framework and all conditions applicable to SCN authorised telecom satellite services are not extended to broadcasting satellite services, teleport, television channels, DPOs, etc.

8. TRAI should further ensure that its recommendations do not cause any adverse impact, whether direct or indirect, on the operation and uninterrupted availability of

broadcasting services. "No-interference" should be ensured for existing legacy users of the C and Ku bands, namely broadcasters, teleports, and DTH operators.

9. In this regard, it may be noted that in the past as well, with the launch of 5G IMT services in India using spectrum adjacent to the satellite C-band, significant concerns regarding interference were raised. A similar risk arises with the introduction of new SCN, NGSO, MSS, and D2D services. Therefore, TRAI must ensure that adequate interference protection measures are mandated before introducing these new services. Authorisation for these services should be subject to the condition that they cannot cause harmful interference to other spectrum users, namely, the incumbent broadcasting/DTH services, who should be granted primacy in protection.

10. As broadcasting increasingly transitions towards high-definition, ultra-high-definition, low-latency live news gathering, cloud production, and digital-first workflows, continued and interference-free access to satellite spectrum for DSNG, teleport, contribution links, and broadcast backhaul infrastructure will remain critical for news broadcasters. It is reiterated that adequate protection measures should therefore be incorporated not only for current operations but also for foreseeable future technological upgrades and evolving broadcasting use cases.

11. Any future framework for SCN authorisation and spectrum assignment should be technologically neutral and sufficiently flexible to accommodate future broadcasting distribution models.

12. The regulatory distinction between carriage infrastructure providers and content providers must be maintained. Merely because broadcasters and digital news entities may utilise emerging satellite-enabled technologies, cloud-based delivery, edge caching, or hybrid broadband-satellite arrangements in the future, they should not be subject to the same regulatory framework applicable to telecom service providers or satellite communication network operators.

13. The introduction of satellite-based broadband, D2D, or integrated satellite-mobile ecosystems should not result in preferential treatment or market dominance by global technology companies having control over both distribution infrastructure and digital content aggregation. Appropriate safeguards may therefore be considered to ensure fair, transparent, and non-discriminatory access to satellite-enabled distribution ecosystems for Indian broadcasters and digital publishers.

14. Any new spectrum assignment in the C-band or Ku-band to an SCN authorized entity must be preceded by a comprehensive impact assessment study, specifically evaluating any interference, if caused to the broadcasting services or their operations. All costs of conducting such a study and the expenses involved in installing any filters, or undertaking any other technical or operational modifications, should be borne solely by the new SCN authorised entity and not passed on to broadcasters or DTH operators.

15. It should be ensured that the spectrum used for public broadcasting services and certain satellite-based services such as Teleports, Television Channels, DTH, Headend-In-The-Sky (HITS), DSNG, etc., is continued to be assigned administratively and not through auction. This would be consistent with the Telecommunications Act, 2023, which provides for administrative assignment of spectrum for any usage that falls under the First Schedule, including certain satellite-based services.

16. Satellite spectrum is a shared resource governed by ITU frequency coordination and, unlike terrestrial spectrum, cannot be divided into unique, identifiable frequency chunks that can be auctioned with a clear right allocated to successful bidders. Satellite spectrum, being a shared resource, cannot be fragmented into pre-determined frequency chunks/units. Its primary objective is to reach remote areas and provide emergency services; therefore, applying the auction methodology to the satellite

spectrum would not only result in gross inefficiency but also enable gatekeeping by wealthy and influential entities. Thereby eliminating any competitive choice for the consumers.

17. To provide D2D by using terrestrial IMT spectrum, foreign satellite operators would need access to spectrum and would typically have to participate in an auction. On the other hand, if the spectrum is administratively allocated to these entities, it may raise concerns regarding whether such allocation is consistent with the public interest doctrine laid down by the Hon'ble Supreme Court.

18. News broadcasters continue to play a critical role in ensuring universal access to news, current affairs, educational, and public interest content, particularly for economically weaker sections and viewers residing in remote and border areas. They are indispensable in ensuring the timely and accurate flow of information, particularly during emergencies and disasters. They serve as the principal medium through which citizens are educated, informed, and exercise their right to receive information.

19. Being the fourth pillar of democracy, the freedom of the press has been steadfastly protected by the judiciary, with Courts consistently preventing any restrictions being placed on the freedom of the press, except the reasonable restrictions expressly permitted under Article 19(2). The medium through which this right is exercised is also invariably part of the freedom of the press. Any restriction or adverse impact on the distribution of content is rightly regarded as a violation of freedom of speech and expression. Therefore, when recommending any proposed framework, TRAI should exercise the utmost care to ensure that the framework does not directly or indirectly encroach upon the media's freedom of speech and expression. Any regulatory or spectrum framework concerning SCN must therefore preserve and protect the viability, continuity, and affordability of Satellite News broadcasting services.

20. It is further submitted that in larger public interest, any future policy concerning satellite-enabled direct content delivery, multicast streaming, or satellite-assisted broadband television ecosystems should ensure continued prominence, accessibility, and equitable treatment of Indian news and public interest broadcasters, including regional language broadcasters.

21. TRAI may also consider recommending that any future satellite communication framework should incorporate mandatory interoperability, transparency, and non-discriminatory carriage principles so that Indian broadcasters, including news channels and digital news platforms, are not subjected to unfair prioritisation, throttling, discoverability discrimination, or commercially unreasonable access conditions on satellite-enabled content delivery ecosystems.

These comments are being made on behalf of the Members of News Broadcasters & Digital Association.

Thanking you,

Regards,

Shreya Rastogi
Secretary

CC: Mr. Rajat Sharma, President NBDA