STARLINK

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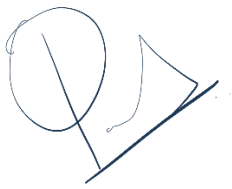
Shri Arun Agarwal
Principal Advisor (NSL)
Telecom Regulatory Authority of India

Subject: Starlink India Counter-Comments - TRAI Consultation Paper on "Framework for Satellite Communication Network Authorisation, and Assignment of Spectrum to Satellite Communication Network Providers"

Dear Sir,

Starlink Satellite Communications Private Limited ("Starlink India") thank the TRAI for the opportunity to participate in this consultation. Our brief counter-comments on certain specific items are enclosed.

Thank you and sincerely,



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Starlink India is pleased to note that there appears to be broad industry alignment across most of its submissions with respect to the envisioned Satellite Communication Network (SCN) authorisation. In this counter-comment submission, Starlink India reiterates its recommendation on two items – both of which will be critical and beneficial to successfully implementing the SCN paradigm.

A. D2D services via satellite using IMT spectrum should be permitted at this stage.

[Reference Question 10]

Given the immediate first order benefits that can accrue across connectivity expansion, disaster recovery, and resilient communications in emergency situations, Starlink India supports permitting D2D services via satellite using IMT spectrum at this stage.

Major national regulators globally have confirmed that existing cellular rules for these bands support a technology-flexible approach, allowing satellite systems to be deployed in support of the primary mobile operations in these frequencies -

- Ofcom in the United Kingdom enabled direct to cell services without modifying the UK Frequency Allocation Table by authorizing their use within existing IMT/mobile bands already licensed to national MNOs. End user devices were covered through license-exemption regulations, avoiding any need for individual terminal licensing. This approach provided a fast, commercially viable pathway by leveraging existing spectrum rights and regulatory tools.
- Similarly, ISED in Canada enabled direct to device deployments by authorizing them within existing mobile spectrum licenses held by Canadian MNOs, again without changing the Canadian Table of Frequency Allocations. Rather than introducing a new license class, it has relied on case-by-case approvals and conditions attached to existing licenses (often tied to MNO-satellite partnerships).
- Countries like Peru and Chile have implemented a regulatory sandbox approach, which has allowed for the commercial deployment of direct-to-cell technology while full frameworks are in development. This approach has enabled the testing and rollout of groundbreaking, potentially life-saving technologies, while allowing regulators to collect data and determine the appropriate shape of any enduring framework, if required.

B. All combinations of spectrum holdings should be permitted, including assignment of user link spectrum to SCN authorised entities

[Reference Question 11]

The benefits of enabling an SCN authorisation framework will only be maximised if the framework enables flexibility to engage across all forms of commercially and technically viable arrangements. The TRAI should allow assignments of both feeder and user link spectrum combinations in a manner that allows for productivity improvements from direct-to-device services becoming realizable with as much certainty and speed as possible.

Rather than impose restrictions on permissible combinations, the TRAI will be able to far better accomplish this goal through eligibility and deployment conditions for (both feeder and user) spectrum holdings that ensure productive use, efficient utilisation, and good behaviour. These include requirements such as:

- Demonstration of relevant ITU satellite filings by each SCN authorised entity, accounting also for the priority attached to that filing;
- "Use it or lose it" conditions of assignment that ensure spectrum is not hoarded or under-utilized by speculators (who would seek to arbitrage access to spectrum against entities that can actually utilize it);
- Open-access obligations that require SCN authorised entities to offer their service to all suitable carriers, such that all mobile operators can benefit from satellite augmented mobile service (subject to the usual reasonable criteria of creditworthiness, service quality, mobile coverage, etc), rather than one MNO using it exclusively; and
- Coordination and interference management being dealt with in accordance with ITU rules.

Maximising the potential combinations in which a deployed SCN can be efficiently used to provide service (and thus maximising value to users) should be the guiding principle for these recommendations. Enabling both one-to-many (a single SCN system being able to empower multiple partnering entities) as well as many-to-one (any partnering entity being able to benefit from multiple SCN systems) arrangements is the clearest path to ensuring this.