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**Subject: Comments on TRAI's Consultation Paper on "The Framework for Satellite Communication Network Authorisation, and Assignment of Spectrum to Satellite Communication Network Providers" dated 08.04.2026.**

Dear Sir,

Greetings from the UK India Business Council (UKIBC).

UKIBC is a premier trade organisation representing prominent British and Indian enterprises within the UK-India corridor. Our operations span various sectors, with a focus on digital and data services, telecoms, financial and professional services, food and drink/retail, as well as defense and aerospace. We collaborate closely with both the Government of India and the UK Government, serving as a conduit for business feedback to help align shared objectives and enhance bilateral investment.

A central pillar of this partnership is our collaboration in the telecom sector where recent initiatives such as the UK Government's Technology Security Initiative (TSI) and the Strategic Exports and Technology Cooperation Dialogue further reinforce the strength and potential of this relationship.

UKIBC is also establishing an India UK Space Industry Group to act as a forum specifically to facilitate and fast-track the India UK space industry relationship in a cohesive manner with a major focus on satellite communications.

We welcome the opportunity to submit comments on the above-referenced consultation paper. Our members strongly support the development of a clear, forward-looking regulatory framework for Satellite Communication Networks (SCN) that enables rapid deployment of satellite-based services, including Direct-to-Device (D2D) technology, in the interest of India's digital connectivity goals. As always, we express our continued appreciation to the Government of India and the Telecom Regulatory Authority of India.

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## **1. EARLY ENABLEMENT OF DIRECT-TO-DEVICE (D2D) SERVICES**

We strongly urge the Authority to permit D2D services using IMT spectrum **without waiting for the outcome of WRC-2027**. Several countries — including the United States, Canada, Australia, the UK, and Bahrain — have already enacted enabling frameworks. Waiting for WRC-2027 risks delaying commercial rollouts in India until 2029–2030, ceding first-mover advantage and leaving unconnected regions without timely coverage.

Spectrum coexistence is manageable since IMT spectrum in D2D deployments is held by the partnering terrestrial service provider (TSP), interference risks are inherently controlled. A no-interference, no-protection (NINP) basis, consistent with Article 4.4 of the ITU Radio Regulations, provides a sound interim framework.

India's existing partnerships between telecom operators and satellite players (such as the Vi-AST SpaceMobile collaboration) demonstrate that D2D is a deployable reality today, not a distant prospect. Early deployment will generate first-hand learning, inform policy, and position India as a standard-setter rather than a standard-follower.

## **2. SCN AUTHORISATION: KEY RECOMMENDATIONS**

### **2.1 ELIGIBILITY AND SCOPE**

- SCN authorisation should be available to Indian entities that are approved satellite operators, their subsidiaries, or entities with contractual agreements with approved satellite operators.
- SCN entities should be permitted to establish gateway earth stations and access feeder link spectrum. They should not, however, hold user link spectrum, which must remain with service-licensed entities.
- SCN entities must provide services only to service-authorized entities (B2B). Direct provision to end consumers must be explicitly prohibited.
- Virtual Network Operators (VNOs) should not be permitted to seek SCNaas.

### **2.2 LICENSING CONDITIONS**

- Validity: 20 years, with renewal for a further 20 years.
- Area of operation: Pan-India.
- A light-touch, simplified licensing regime is appropriate given the nascent stage of these services.
- Consumer-facing obligations (KYC, LI, emergency services, QoS, MNP, billing) must remain with the service-authorized partnering entity, not the SCN entity.
- SCN entities must hold a valid IN-SPACE authorisation as a condition of enabling communication services from space on Indian territory.

### **3. SPECTRUM ASSIGNMENT**

We recommend the following spectrum allocation framework:

- **Feeder links (FSS and MSS):** May be assigned to SCN entities or directly to service providers through administrative assignment.
- **User links (FSS and MSS):** Must be assigned only to service-authorized entities (existing Unified Licensees or authorisations under the Telecom Act 2023). No user links should be assigned to SCN entities.
- **D2D via IMT spectrum:** No additional spectrum assignment required; the partnering TSP's existing IMT spectrum assignment is sufficient. All IMT FDD bands should be eligible.
- **NFAP modification:** A secondary MSS allocation in IMT-identified bands should be made on a non-interference basis to facilitate D2D services.

### **4. SPECTRUM AND FINANCIAL FRAMEWORK**

- **No additional spectrum charges:** Service-authorized entities using their existing IMT spectrum for D2D should face no additional spectrum levy. The spectrum has already been paid for at auction and is technology-neutral.
- **Feeder link charges:** Standalone charges for feeder links should be nominal, given their shared backhaul-like nature.
- **MSS user link charges:** A light-touch mechanism with shorter validity (up to 5 years) is appropriate, given the nascent stage of MSS services globally. Market-based pricing should be introduced post stabilisation.
- **No double-counting of AGR:** Spectrum charges for satellite services must apply only to satellite-sourced revenues, not to revenues already subject to AGR-based levies from terrestrial services.
- **Entry fee:** Rs 10 lakh, aligned with DCIP/SESG authorisations.
- **Authorisation fee:** Nil, consistent with TRAI's own recommendations for SESG and similar network-only authorisations.
- **Minimum equity/networth:** Nil, consistent with other network authorisations.
- **Bank guarantees:** None required (PBG/FBG), aligned with DCIP/IXP/SESG precedents.
- **Application processing fee:** Rs 10,000, consistent with other network authorisations.

### **5. COMMERCIAL FLEXIBILITY — NO MANDATORY REFERENCE AGREEMENTS**

Commercial arrangements between SCN entities and service providers inherently vary by business model, technology, risk allocation, and geography. Mandating reference agreements would introduce rigidity, inhibit innovation, and extend negotiations unnecessarily. Existing Indian telecom policy already allows flexible bilateral contracting under the VNO framework, IP-1 sharing, and spectrum leasing arrangements. We strongly recommend that commercial agreements be left to mutual negotiation between the parties.

## **6. ENABLING EXISTING LICENSEES**

Existing Unified License (Access service) holders should be explicitly enabled to provide D2D and satellite-based services — either directly by establishing gateways, or through partnership with SCN entities — without requiring a separate SCN authorisation. This may require suitable amendments to the Unified License conditions. We request the Authority to issue enabling recommendations to DoT in this regard.

## **7. CONCLUSION**

India has a limited window to establish itself as a first-mover in satellite D2D communications. A clear, light-touch, and promptly issued regulatory framework — one that enables D2D via IMT spectrum now, allocates feeder links to SCN entities, restricts user links to service-authorised entities, and avoids unnecessary financial burdens — will unlock investment, bridge the digital divide, and position India as a global standard-setter in this transformative technology.

We hope these inputs will merit your kind consideration.

Thanking you,

*Neil Bhutani*

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