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भारत संचार निगम लिमिटेड
(भारत सरकार का उपक्रम)
BHARAT SANCHAR NIGAM LIMITED
(A Govt. of India Enterprise)

No. BSNLCO-RGLN/25/1/2021-REGLN dated 10-12-2021

To,
Shri S.T. Abbas,
Advisor (Networks, Spectrum & Licensing),
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg,
New Delhi – 110 002

**Sub: Comments on Consultation Paper on Licensing Framework for Establishing
Satellite Earth Station Gateway**

In reference to Consultation Paper on Licensing Framework for Establishing Satellite Earth Station Gateway dated 15-11-2021, the comments of BSNL are as below:

Q1. Whether there is a need to have a specific license for establishing satellite Earth Station Gateway in India for the purpose of providing satellite-based resources to service licensees? Do justify your answer.

A separate authorization under UL may be created for establishing satellite Earth Station Gateway in India for the purpose of providing satellite-based resources to service licensees.

The existing licensees may be permitted to provide the services under same license (Unified License) by opting to apply for the proposed new authorization. New entities may apply for Unified License with authorization(s) they desire.

This will ensure uniformity of licensee conditions across all licenses.

Q2. If yes, what kind of license/permission should be envisaged for establishing Satellite Earth Station Gateway in India? Do provide details with respect to the scope of the license and technical, operational, and financial obligations, including license fee, entry fee, bank guarantees, and NOCC charges, etc.

The conditions of UL should be uniformly applied to Earth Station licensee. This will ensure similar financial and other obligations for all the operators.

It should be mandatory for any entity having authorization for installing earth station to provide connectivity/resources to all service licensees on non-discriminatory manner and within a defined timelines. The denial of connectivity should be considered as violation of license condition.

Q3. Whether such Earth Station license should be made available to the satellite operator or its subsidiary or any entity having a tie-up with the satellite operator? Do justify your answer.

Yes, it should be made available to the satellite operator or its subsidiary or any entity having a tieup with the satellite operator as it will open up new opportunities and also level playing field for all.

Q4. What mechanism/framework should be put in place to regulate the access to satellite transponder capacity and satellite based resources of a Satellite operator/Earth Station licensee by the service licensees so as to get the resources in a time-bound, transparent, fair and non-discriminatory manner?

TRAI must come up with separate Regulation on the above as has been done in case of TIR(Telecom Interconnect Regulation).

Q5. Whether the Earth Station Licensee should be permitted to install baseband equipment also for providing satellite bandwidth to the service licensees as per need? Provide a detailed response.

Yes, the earth station licensee should be permitted to install baseband equipment also for providing satellite bandwidth to the service licensees as per need.

If the earth station licensee is permitted to install baseband equipment also for providing satellite bandwidth to the service licenses as per need, the Service Licensee will have the flexibility to hire the bandwidth in Mbps as per the Customer requirement. It will also lead to more efficient use of the baseband and satellite bandwidth as whole as

the infrastructure will be shared and the consequent cost effectiveness achieved will enhance connectivity which is beneficial for all stakeholders.

Q6. What amendments will be required to be made in the existing terms and conditions of the relevant service authorizations of Unified License, DTH License/Teleport permission to enable the service licensee to connect to the Satellite Earth Station Gateway established by Earth Station Licensee/Service Licensee, for obtaining and using the satellite transponder bandwidth and satellite-based resources? Do justify your answer.

The mandate for the service licensee to establish its own gateway for rendering satellite based communication should be expunged. The service licensee should be permitted to use the transponder capacity and base band equipment resources allocated by the Earth Station Licensee.

Q7. Whether the sharing of Earth Station among the licensees (between proposed Earth Station licensee and Service Licensee; and among service licensees) should be permitted? Do provide the details with justification.

Yes, the sharing of Earth Station among the licensees (between proposed Earth station licensee and Service Licensee and among service licensees) should be permitted.

This will enable sharing of infrastructure as per the customer requirements of respective service licensee and the consequent improvement in efficiency of usage of the available bandwidth will accrue cost benefits for all stake holders especially customers and reduce time for deployment by service licensee which will enable faster provision of service based on the dynamics demand. This will also promote investment in establishing of infrastructure due to higher returns from the better utilization of common infrastructure.

Q8. To whom should the frequency carriers be assigned: the Earth Station Licensee, or the Service Licensee, or whoever establishes the Satellite Earth Station? Do justify your answer.

Frequency carriers be assigned to Earth Station Licensee. This will enable the sharing of Satellite Earth Station by multiple Service Licensee or Satellite Operators leading to

more effective utilization of resources and increasing the return on investment as the setting up of Satellite Earth Station is capital intensive.

Q9. What should be the methodology for the assignment of spectrum for establishing satellite Earth Station? Provide a detailed justification.

The spectrum to be allocated to Earth Station Licensee by the process of open auction, similar to access spectrum being provided to Service Licensee.

Q10. What should be the charging mechanism for the spectrum assigned to the satellite Earth Station licensee? Elaborate your answer with justification.

Comment: As per the recent decision of DoT, there should be no SUC for the spectrum assigned through future auctions.

Q11. Give your comments on any related matter that is not covered in this Consultation Paper

Comment: Nil

Yours faithfully



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