

Prasar Bharati  
(India's Public Service Broadcaster)  
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No: P-1/013(59)/2019-Ops.


Dated 10.01.2022

Subject:- TRAI Consultation Paper on Auction of Spectrum in frequency bands identified for IMT/5G - Comments from Prasar Bharati regarding.

Reference: TRAI Consultation Paper No. 8/2021 dated 30.11.2021

In response to the Consultation Paper on "Auction of Spectrum in frequency bands identified for IMT/5G" by Telecom Regulatory Authority of India (TRAI) released on 30th November 2021, the comments from Prasar Bharati on various issues raised in the Consultation Paper are annexed.

2. This issues with the approval of CEO, Prasar Bharati.

  
(Prakash Veer)  
DDG (Ops)

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**Comments from Prasar Bharati on TRAI Consultation Paper on Auction of Spectrum in frequency bands identified for IMT/5G**

Prasar Bharati, the country's Public Service Broadcaster is providing radio and television services in the country. In addition to conventional Radio and TV Broadcasting, Prasar Bharati has also engaged in ensuring its presence through multiple delivery platforms including Analog Terrestrial, Digital Terrestrial, Satellite, Streaming, DTH etc.

1.1 The consultation paper primarily pertains to issues related with Auction of Spectrum in frequency bands identified for IMT/5G. In this consultation paper, spectrum frequencies 526-698 MHz, 3300-3670 MHz and 24.25-28.5 GHz (mm Wave), are also proposed to be auctioned for the first time, in addition to the spectrum auctions in other bands which have been held earlier.

1.2 At present, the frequency band 526-582 MHz is being used by Doordarshan in Prasar Bharati for providing Terrestrial TV Broadcasting. Many Analogue, Digital Ready and Digital Terrestrial TV Transmitters are operating in the band. The old outdated Analogue Terrestrial TV (ATT) Transmitters are being rationalized/phased out for migration towards digital. Also Digital ready transmitters are under installation in Union Territory of Jammu & Kashmir for which the WPC has provided DL in this band only.

1.3 In addition, the allocation of 3300-3670 MHz for IMT will result in reduction of the guard band between IMT Services and C Band Satellite Services from existing about >80 MHz to 10 MHz only. Doordarshan is using C-band satellite services {uplink-5.925-6.425 GHz and downlink 3.7 - 4.2 GHz} for contribution and distribution of its channels, which are subsequently used by Cable operators(MCO/LCO)/DTH operators for mandatory carriage on their platforms, DD FreeDish DTH and DD Terrestrial Transmitters to reach the viewers.

1.4 Although, in case of DD, effective guard band /separation is 30 MHz, however, the exact impact on satellite services would need to be assessed by Department of Space.

2.0 The comments of Prasar Bharati with respect to the relevant questions under **Chapter-V**: Issues for consultation are as under:

**Issues related to Quantum of Spectrum and Band Plan**

**Q.1.** Whether spectrum bands in the frequency range 526-617 MHz, should be put to auction in the forthcoming auction? Kindly justify your response.

**Ans.** At present frequency band 526-582 MHz is being used by Prasar Bharati (DD) for providing Terrestrial TV Broadcasting. Many Analogue, Digital Ready and Digital Terrestrial TV Transmitters are operating in the band. The old outlived Analogue Terrestrial TV (ATT) Transmitters are being rationalized/phased out for migration towards digital. Also Digital ready transmitters are under installation in UT of J&K for which the WPC has provided DL in this band only.

In view of above whole frequency band 526-617 MHz band should not be put for auction in forthcoming auction unless the existing services and future plans of Prasar Bharati (DD) are taken care of.

Justification for this is provided in **Annexure-I**

**Q.2.** If your answer to Q1 above is in affirmative, which band plans and duplexing configuration should be adopted in India? Kindly justify your response.

**Ans.** Not applicable.

**Q3.** In case your answer to Q1 is in negative, what should be the timelines for adoption of these bands for IMT? Suggestions to make these bands ready for adoption for IMT may also be made along with proper justification.

**Ans.** In view of position explained in point no 1 , frequency band 526-617 MHz band should not be put for auction in forthcoming auction unless the existing services and future plans of Prasar Bharati (DD) are taken care of.

The timeline for adoption of these bands for IMT would depend of meeting out the following conditions :

- i. The requirements of Terrestrial TV services in the frequency band 470-582 MHz are finalized.
- ii. Co-ordination for having enabling clause of identification of suitable band below 698 MHz for IMT in India is completed.
- iii. The process of identifying globally harmonized band for IMT below 698 MHz by ITU is completed.

Justification is provided in **Annexure-I**

**Q5.** For 3300-3670 MHz frequency range, which band plan should be adopted in India? Kindly justify your response.