



## COMMENTS OF TELESAT

In response to the TRAI consultation paper on  
*The Terms and Conditions of Network Authorisations  
to be Granted Under the Telecommunications Act, 2023*  
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## **Introduction**

Telesat is grateful for the opportunity to participate in this consultation and respectfully provides the replies to a couple of questions. Replies have been kept short and to the point, as similar arguments have already been made in relation to previous consultations.

**Q.7 Whether there is a need to make any changes in the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of the Satellite Earth Station Gateway (SESG) authorisation, as recommended by TRAI on 29.11.2022? If yes, what changes should be made in the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of the SESG authorisation? Kindly provide a detailed response with justification.**

Telesat supports:

- A separate Satellite Earth Station Gateway (SESG) License (i.e. the SESG License will not form part of the Unified License) and
- The recommendation for SESG Licensee not being permitted to provide Services

However:

- As some satellite systems require that the baseband equipment be owned and operated by only one entity, flexibility should be allowed in terms of who can install the baseband equipment at the SESG
- The recommended disclosure of the financial terms of the offer to service licensees would lead to confidential and commercially sensitive information become public
- The SESG licensee needs to have the possibility of using spectrum independently of the service licensee for operational purposes, i.e. not service provision (e.g. for testing, installation, operations management)

**Q8. Whether there is a need to introduce a new authorisation for establishing, operating, maintaining or expanding satellite communication network, which may be used to provide network as a service to the entities authorised under Section 3(1)(a) of the Telecommunications Act, 2023? If yes-**

**(a) What should be the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of such authorisation?**

**(b) Whether an entity holding such authorisation should be made eligible for the assignment of spectrum for both feeder link as well as user link?**

**Kindly provide a detailed response with justification.**

Telesat is of the view that there is no need for such new authorization. The authorization of IN-SPACEe for use of the space segment is sufficient, while the ground segment (comprised of user terminals and gateways) will be licensed to the service licensees and gateway licensees respectively. The suggested new authorization, beside not being aligned with general practices, is redundant and would introduce an additional degree of complexity.

In relation to spectrum assignment for the feeder link, while TRAI has recommended that it should be assigned the service licensees, in the case of multiple service licensees this could imply multiple licensing of the same spectrum for operation of the same antennas. Overall, the final arrangements for spectrum allocation need to be coherent and harmonious. A light licensing to the SESG licensee, may be best and could avoid possible redundancies.

In relation to the TRAI proposed merger of the GMPCS and VSAT CUG licenses, Telesat is of the view that these services are rather different, with GPMCSs using typically lower frequencies with very different characteristics, including sharing capabilities. Furthermore, GMPCs services typically operate as MSS, while VSAT CUG services as FSS. While the desire to simplify the licensing framework is understandable, Telesat is of the view that it would be best to keep the licenses separate.

On the other hand, the services provided under the VSAT authorization should be categorized as public, including also backhauls and IFMC services. Furthermore, VSAT licensees should be able to provide internet without the need for an ISP authorization.