

**November 17, 2025**

Subject: Comments on Stakeholder Suggestion  
Regarding MSS Spectrum in TRAI's  
Consultation on IMT Spectrum Auction

**Shri Akhilesh Kumar Trivedi, Advisor  
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Telecom Regulatory Authority of India, TRAI  
Mahanagar Doorsanchar Bhawan  
Jawahar Lal Nehru Marg, New Delhi – 110002**

**Dear Mr. Shri Akhilesh Kumar Trivedi:**

The Mobile Satellite Services Association (MSSA) is a non-profit industry association, founded in 2024, that seeks to promote and advance the emerging ecosystem for advanced Non-Terrestrial Network (NTN) services, including direct-to-device (D2D). MSSA supports the efforts of advanced NTN solutions providers, including terrestrial mobile and satellite operators, original equipment manufacturers, infrastructure providers, chip vendors, and others. MSSA is focused on facilitating a global ecosystem utilizing spectrum already allocated and licensed for mobile satellite services (MSS) and well-suited for integration into a broad range of mobile devices. More specifically, MSSA seeks to facilitate global mobile connectivity via satellite through open, standards-based solutions. More information about MSSA is available at [www.MSS-Association.org](http://www.MSS-Association.org)

MSSA provides the following comments solely in response to a stakeholder suggestion that specific Mobile-Satellite Service (MSS) spectrum bands, such as the L-band and S-band, should be included in this IMT auction consultation. MSSA does not offer comments on other parts of the consultation at this time, but reserves the right to do so as needed in future regulatory proceedings.

Therefore, MSSA respectfully submits the following considerations:

- MSSA fully supports the legislative provisions of the Telecommunications Act 2023, and the policy direction set by the Hon. Union Minister for Communications (2025), that warrant the administrative assignment of satellite spectrum, including the internationally coordinated Mobile Satellite Services (MSS) spectrum bands. MSSA notes that one of the submissions received on this consultation ignores the mandate of that Act as well as the Ministerial policy direction on the administrative assignment of MSS spectrum. Such an attempt should be considered outside the intended scope of this consultation on IMT spectrum.
- Furthermore, MSSA notes that MSS spectrum serves safety-of-life uses and critical communications required for public service and government needs. Moreover, MSS spectrum is being increasingly utilized for advanced MSS applications, including complementary services that support terrestrial mobile operators through Non-Terrestrial Networks (NTN). MSSA members remain committed to developing connectivity solutions in partnership with terrestrial mobile operators.

MSSA looks forward to continuing its collaboration with TRAI and thanks the Authority for the opportunity to provide these comments, and remains available to offer any additional information or clarifications as required.

*Yours sincerely,*

Mobile Satellite Services Association (MSSA)