

Reference TRAI/CP 08/2025

18 November 2025

Shri Akhilesh Kumar Trivedi

Advisor (Networks, Spectrum and Licensing)
Telecom Regulatory Authority of India
New Delhi

Subject: SIA-India's Counter Comments on TRAI's Consultation Paper on the Auction of Radio Frequency Spectrum in the Frequency Bands Identified for International Mobile Telecommunications – Consultation Paper No. 8/2025

Dear Shri Akhilesh Kumar Trivedi,

This is with reference to TRAI's Consultation Paper No. 08/2025 and the subsequent comments submitted by stakeholders. A review of the comments submitted by one particular stakeholder reveals that, in our understanding, their proposals fall outside the scope of the present Consultation. Furthermore, the proposals appear to misdirect the objectives of the consultation process and risk undermining the stability and growth of the emerging satellite communications sector—an outcome that would be detrimental to national interests. Even if such proposals were within scope, they should be set aside as frequency *assignments*, not *auctions*, are consistent with international norms and essential for maintaining the stability of the global and domestic satellite industry.

Firstly, the comments submitted by the stakeholder in question clearly fall outside the scope of this Consultation. As illustrated in the table below, the Consultation explicitly identifies International Mobile Telecommunications (IMT) frequency bands, which do not overlap with the L-band and S-band MSS allocations¹.

Frequency Band (MHz)	IMT ² or MSS ³
824-844	IMT
869-889	IMT
890-915	IMT
935-960	IMT
1525-1559	MSS
1610-1626.5	MSS
1626.5-1660.5	MSS
1710-1785	IMT
1805-1880	IMT
1920-1980	IMT
1980-2010 ⁴	MSS
2110-2170	IMT

¹ See Consultation at Chapter 2.A.

² This column includes the IMT frequencies that the Consultation addresses.

³ This column includes the MSS L-band and S-band frequencies, which the Consultation does not address, in the international frequency allocation table.

⁴ The frequency band 2010-2025 MHz includes a primary MSS allocation in ITU region 2 and is under consideration for a primary (globally harmonized) MSS allocation in both ITU regions 1 and 3 under ITU WRC-27 agenda item 1.14.

Frequency Band (MHz)	IMT ² or MSS ³
2170-2200 ⁵	MSS
2300-2400	IMT
2483.5-2500	MSS
2535-2555	IMT
2615-2655	IMT
3300-3670	IMT
6425-6725	IMT
7025-7125	IMT
24250-27500	IMT

The L-band and S-band MSS frequencies involve distinct technical, regulatory, and policy considerations that this Consultation does not encompass. Therefore, SIA-India respectfully submits that TRAI should confine its deliberations to the IMT frequencies explicitly identified in the Consultation.

Secondly, and notwithstanding the scope issue, SIA-India reiterates that *frequency assignments*, not auctions, remain the internationally accepted approach for MSS bands. Assignments safeguard the stability of the limited globally harmonized MSS spectrum, prevent market disruption and monopolization, ensure equitable interference-free access, reduce financial uncertainty, and promote rapid deployment and affordability. This approach aligns with ITU principles and the long-standing regulatory philosophy followed by TRAI. Accordingly, TRAI should continue to assign—rather than auction—MSS frequencies.

In view of the above, SIA-India submits that the comments submitted by the stakeholder in question are unwarranted and outside the purview of the current consultation process. Any attempt to alter the existing MSS framework will adversely impact optimal spectrum utilization and the broader interests of consumers and the satellite industry. TRAI is therefore requested not to take cognizance of such proposals.

About SIA-India:

The Space Industry Association of India (SIA-India) is a non-profit organization established to serve and promote the common interests of the satellite industry ecosystem in India and seeks to ensure that the satellite industry benefits from the appropriate political, industrial and regulatory environment to fulfil their vital role in the efficient and ubiquitous delivery of satcom services in India.

With warm regards



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⁵ The frequency band 2160-2170 MHz includes a primary MSS allocation in ITU region 2 and is under consideration for a primary (globally harmonized) MSS allocation in both ITU regions 1 and 3 under ITU WRC-27 agenda item 1.14.