



NELCO/TRAI/212205
03.01.22

To
The Advisor (NSL)
TRAI, MTNL, JLN Marg
New Delhi - 02

Kind Attn: Shri ST Abbas

Sub: Counter Comments on the Licensing Framework for Establishing Satellite Earth Station Gateway

Dear Sir,

Please find enclosed our suggestion /counter comments on few points of Consultation paper on Licensing framework for establishing satellite earth station gateway for your consideration.

Thanking you

For **Nelco Ltd.**

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Nelco's Counter Comments wrt

Consultation Paper on Licensing Framework for Establishing Satellite Earth Station Gateway

Basis the opportunity given by TRAI to put counter comments wrt TRAI consultation paper on 'Establishing Satellite Earth Station Gateway', Nelco would like to put its counter comments wrt few points, as mentioned below –

Point no 1.

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.

One of the respondents – BIF, in its response to this consultation paper, has mentioned about creation of standalone Earth Station Gateway (ESG) wrt GSO-wide beam and GSO-HTS single gateway. As mentioned in the response wrt same query point 1.6 by BIF, it also states that for GSO-widebeam and GSO-HTS single gateway there is no requirement for change in existing model.

In existing model licensed satellite communication service provider (SCSP) operating on GSO-widebeam satellites, 'GSO-HTS single gateway' satellites have invested heavily considering existing licensing framework and created their long-term business models around the same. It is important to protect the investment made by Service licensee on GSO-widebeam satellites. Thus, for GSO-wide beam satellites & GSO-HTS Single Gateway, the earth stations are established by Service Licenses and thus there is no need to have separate license for establishing satellite Earth Station Gateway in India.

Moreover, it is to be noted that that the focus of this consultation paper is wrt new technology and as per reference to DOT letter to TRAI is focussed wrt HTS, MEO & LEO and GSO-widebeam satellites are in part of the reference to preamble of this consultation paper.

Point no 2.

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.

BIF in its response has mentioned that "Currently for Wide beam GSOs , the Baseband is under the direct control of the licensed SCSP. Going forward for all scenarios, it is suggested that the Baseband be made a part of the ESGO along with the RF & Antenna"

As put in by BIF in response to Q1 wherein it has also acknowledged that existing framework wrt GSO-widebeam and GSO-HTS, single gateway is working fine and there is no need for any change.



Technically, GSO-widebeam and GSO-HTS is providing transparent connectivity and is less complex and is independent of baseband equipment. The scope of Earth Station licensee should be limited to putting up Antenna, RF equipment only. It may also be noted that different Service Licensees have different baseband preferences. Invariably the Service Licensee deploys more than one baseband technologies to address different applications/market segments. Baseband equipment should be installed by Service licensee only to have full control over the services provided to its customers.

We would like to re-iterate that baseband for GSO-widebeam and GSO-HTS should be provided by SCSP.

Point no 3.

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.

Satellite Services are provided by SCSP and wrt GSO-widebeam and GSO-HTS, there is no specific correlation between Satellite capacity & baseband, it is strongly recommended that baseband should be setup by SCSP.

The Service Licensee is responsible for the design of their network, the frequency / carrier plan using the assigned transponder bandwidth. The carrier plan is one of the key features of the of the Service Licensee, which helps them to run an optimized service and have full control over the network.

In case of GSO-widebeam and GSO-HTS, the frequency carriers should be assigned to the Service Licensee which is the current practice in India.