

1178/TRAI/ISPAI/20

March 11, 2020

Shri S T Abbas,
Advisor (Network, Spectrum & Licensing)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan,
Old-Minto Road, Near Zakir Husain College,
New Delhi – 110002

Subject: ISPAI response to TRAI consultation paper on 'Provision of Cellular backhaul connectivity via Satellite through VSAT under Commercial VSAT CUG Service Authorization'

Dear Sir,

We congratulate the Authority to have come out with the consultation paper on the matter captioned above and sincere thanks for providing us the opportunity to submit our response on this matter.

We have enclosed our comprehensive response for your consideration. We believe that the Authority would consider our response in positive perspective and incorporate our concerns on the subject matter.

Looking forward for your favourable consideration.

Thanking you,

With Best Regards,
For Internet Service Providers Association of India



Rajesh Chharia
President
+91-9811038188
rc@cjnet4u.com

Encl: As above

ISPAI Response

TRAI consultation paper on 'Provision of Cellular backhaul connectivity via Satellite through VSAT under Commercial VSAT CUG Service Authorization'

Issues for consultation:

Q1. Keeping in view the connectivity requirements in remote and difficult areas, should the Commercial VSAT CUG service provider be permitted to provide backhaul connectivity for mobile services and Wi-Fi hotspots via Satellite? Please justify your answer.

ISPAI Response – No Comment

Q2. Whether the scope of Commercial VSAT CUG Service Authorization be enhanced under both Unified License and UL(VNO) license to enable the provision of the said backhaul connectivity? Please justify your answer.

ISPAI Response – No Comment

Q3. Should the licensee having authorization for both Commercial VSAT CUG and NLD services be allowed to share VSAT Hub & VSAT terminals for the purpose of providing authorized services? Please justify your answer.

ISPAI Response – No Comment

Q4. Whether the licensee should be permitted to share its own active and passive infrastructure for providing various services authorized to it under the other service authorization of UL and/ or other licenses? [In other words, whether clause 4.3 of Chapter -VIII (Access Service authorization) be made applicable for all other authorizations also] Is there a need to impose any restrictions? Please enumerate and justify your answer.

ISPAI Response - Licensee should be permitted to share its own active and passive infrastructure for providing services of all Licensed service providers including VNOs and ISPs authorization.

This would enable efficient utilization of installed equipment and network and would enable spread of all licensed services specially in rural and remote areas where satellite communication enables connectivity.

Q5. Whether formula-based spectrum charging mechanism for VSAT services in NLD/Access license is adequate and appropriate? If not, whether spectrum charging for VSAT services in NLD/Access service license should be made on AGR basis instead of existing formula basis mechanism? Whether it will require accounting/ revenue separation 23 for satellite based VSAT services under NLD/Access license? Please elaborate and provide proper justification.

ISPAI Response - We request making more license free spectrum to enable spread of services in rural and remote areas.

Q6. Please give your comments on any related matter not covered in this Consultation paper.

ISPAI Response – No Comment

Internet Service Providers Association of India

1509, Chiranjiv Tower, 43, Nehru Place, New Delhi – 110 019 – INDIA

Email: info@ispai.in, URL: www.ispai.in