

Nelco's Counter Comments to TRAI Consultation paper

On

Telecommunication Infrastructure Sharing, Spectrum Sharing, and Spectrum Leasing

Basis the opportunity given by TRAI to put counter comments wrt TRAI consultation paper on 'Telecommunication Infrastructure Sharing, Spectrum Sharing, and Spectrum Leasing', Nelco would like to put its counter comments wrt few points, as mentioned below –

Q13. Any other issues/ suggestions relevant to the spectrum sharing between access service providers, may be submitted with proper explanation and justification.

One of the respondent organisations in its response to this consultation paper, has mentioned that all forms of spectrum sharing should be permitted among all service providers under various licenses/ authorizations and not limited to access service provider.

We would like to put forward that the spectrum should be allowed to be used for the purpose it has been assigned for. For example if spectrum is acquired under auction under 'access' services that it should be allowed to be used for access services only, similarly if spectrum is assigned for satellite communication services than it should not be allowed to be used only for satellite communication and not for any other services. Considering different commercial value for different spectrum, methodology of assignment and the purpose for which the spectrum is assigned etc., any spectrum sharing should be only restricted to same kind of services for which spectrum is allocated for.

Q15. In case it is decided to implement ASA technique for secondary use of frequency spectrum assigned to non-TSP primary users, please provide your response to the following questions with detailed justification:

a) What are the potential spectrum bands in which ASA implementation can be considered?

Couple of the respondent organisations, have mentioned in their response for ASA implementation, existing satellite spectrum like Ext-C, Ku, Ka band, also may be considered.

Spectrum assigned for satcom services is limited and is actively used by satcom service providers and there are thousands of customer terminals working on this spectrum. Service providers and satellite operators have been sharing spectrum in an effective manner by using the same frequencies across multiple satellites, satellite systems, earth stations and user terminals. In summary, satellite spectrum is already shared for use of satellite services and does not require further sharing with other services. Satellite communication is used for addressing requirements which are not possible with terrestrial networks. Moreover, there is limitation is spectrum available for Satellite communication. Under these circumstances further sharing of the spectrum assigned for Satellite communication, with the TSPs would significantly hamper the growth of the Satellite communication sector and thereby impacting the country as a whole.