

Counter Comments with Regard to Consultation Paper on Captive VSAT CUG Policy Issues

Further to comments from various agencies and this office, following is being submitted as an additional input to strengthen and consider our views:

1. VSAT/ Radio License renewal process needs to be made online by issuing of renewal slip/ Certificate on the basis of periodic payment made and an E-Certificate Renewal Slip for every radio license may be generated. This will save the entire paper work process, costs, record-keeping and time for issuing renewals in time and to satisfaction of all agencies.
2. It is suggested that SACFA clearance may not be required for any of the offshore (at sea) locations as is the case of all vessels (ships) at sea. The same will reduce the process and save time of all the concerned agencies and bring level playing field similar to treatment given to shipping. Presently, for offshore at sea location sites, SACFA is being insisted upon (under full siting and under 7/40 exemption category depending on the antenna size), and the exercise becomes mundane delay-aiding process, without justified necessity. Data and voice with speed and quality is an essential tool and a necessity in every day ship or any installation unit working at sea.
3. We agree with the majority view that there should be no additional charge for the second Hub. Charges on second Hub adds to the service cost provided by Government organization.
4. We feel that there should be clear distinction between Commercial Networks and Network for Non-Commercial use like ONGC. In both cases though spectrum is used but the purpose are entirely different. While Commercial networks use spectrum for the purpose of business/ profit by providing communication to end users whereas Captive networks deployed by Government/ PSUs are purely for enabling operations in difficult terrain/ distant locations where no other means of communications available. ONGC has deployed Captive network for supporting its endeavor towards India Energy Security and at times extend support to meet all the services for exigencies on land/at port/sea by other organisation, enterprise or company at the command and need of government in case of national emergencies like the unfortunate earthquake disaster, cyclones for support services and needs for all kinds. Therefore it is once again suggested that there should be distinction between these categories and charges towards such networks should be on administrative rate.
5. We don't agree with the amount suggested by INCOIS for 2nd Hub. We suggest that 2nd Hub should not be charged. We re-iterate "Maintaining captive Satellite network involves huge expenditure. ONGC has setup captive network for enabling operations which are critical to country's initiatives towards energy security. Criticality of operations warrants deployment of 2nd Hub for continuity of communication at distant locations including offshore.
2nd Hub is primarily a contingent measure to ensure continuity of communication during disaster situation at main Hub. It is felt that there should not be any charge for 2nd Hub

for the captive network like ONGC". At no time both main Hub and 2nd Hub will be simultaneously in operation.

We suggest that additional VSAT can be added in the Monthly Operation Report and accordingly payments can be regularized. However, SACFA Clearance may be obtained prior to putting VSAT into operation so that Decision Letter can be amended accordingly.

6. It is once again submitted that the process, applications filing and various clearances presently are time consuming, too cumbersome and many a times deadlocked due to ambiguity in rules with respect to permissions for the offshore oilfield requirements. It is also observed that there is no provision in the online filing process for accommodating maritime/ at-sea locations. Online filling process should have provision to accommodate locations operating at sea/ offshore.
7. It is also observed that there is delay in issuing AIP by WPC for PMP & PTP systems when they are part of same Captive Network. The processing time and issuing of AIP for PMP and PTP are different which leads to situation wherein Customer needs to make payment towards issued AIP while the other is still awaited. The time gap between these AIPs may vary from months to over a year. In such a situation Customer is unable to deploy the network but needs to make payments to keep the allocation alive.
8. Approvals, permissions, timelines need to be reduced to service every business model for the best growth with adequate safety and security concerns duly addressed. A single window approach with a period of maximum 90 days from date of application may be considered till issuing of AIP for CUG network (starting from network approval to issuing AIP). Provision be made such that application can be submitted only after DoS/ ISRO has agreed in principle to allocate desired transponder i.e. C, Ext. C, Ku, Ka etc.
It is also suggested that Space segment charges should become payable from the date of NOCC clearance for up-linking rather than from date of allotment letter. However, Bank Guaranty may be made mandatory requirement for issuing allotment letter.