

NELCO / TRAI/ 212202
07.05.21

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

Kind Attn: Shri ST Abbas

Sub: Counter Comments -Consultation paper on Licensing Framework for Satellite-based connectivity for low bit rate applications.

Dear Sir,

Please find enclosed our counter comments on Consultation paper on Licensing Framework for Satellite-based connectivity for low bit rate applications.

We M/s Tatanet Services Ltd (TNSL) , A Tata Enterprise, is a Satellite Communication Service Provider in India, providing highly reliable connectivity solutions across the country. TNSL currently holds licenses for Commercial VSAT Closed User Group (CUG) Communication Services and have the IFMC authorization from DOT.

Thanking you

For **Nelco Ltd.**



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Nelco's Response to Counter Comments

TRAI CP on Licensing Framework for Satellite-based connectivity for low bit rate applications

Basis the opportunity given by TRAI to put counter comments wrt TRAI consultation paper on 'Satellite-based connectivity for low bit rate applications', Nelco would like to put its counter comments wrt few points, as mentioned below –

Point no 1.

One of the respondent organisations in its response to this consultation paper, has mentioned about principles of spectrum allocation. We would like to put forward that topic of 'Principles of Spectrum allocation for satellite communication', is not in the scope of this discussion and should be kept outside the preview of this consultation paper & associated discussions.

Point no 2.

Q5. The existing authorization of GMPCS service under Unified License permits the licensee for provision of voice and non-voice messages and data services. Whether the scope of GMPCS authorization may be enhanced to permit the licensees to provide satellite-based connectivity for IoT devices within the service area? Please justify your answer.

Many of the respondent organisations, have mentioned in their response that GMPCS should be allowed to offer Satellite based connectivity for IOT devices.

We would like to re-iterate our point that GMPCS - 'Global Mobile Personal Communication by Satellite', as name itself suggests, was envisaged as a license which is to be used for personal communication only. Considering this 'Satellite based connectivity for IOT' is to be primarily used for Machine to Machine (M2M) communication, it should not be allowed under authorisation of GMPCS service.

Point no 3.

Q9. (i) As per the scope mentioned in the Unified License for NLD service Authorization, whether NLD Service providers should be permitted to provide satellite-based connectivity for IoT devices. (ii) What measures should be taken to facilitate such services? Please justify your answer.

Many of the respondent organisations, have mentioned that NLD Service providers should be allowed to offer Satellite based connectivity for IOT devices.

We would like to re-iterate our point that NLD is inter-circle backbone license and not permitted to have direct connectivity to end customer terminals. We would like to reiterate our point that under the scope mentioned in the Unified License of NLD service Authorization, NLD Service providers should not be permitted to provide Satellite-based connectivity for IOT devices.