



**VIL/RCA/PB/2021/1032**

20<sup>th</sup> December 2021

**Shri Syed Tausif Abbas**  
**Advisor (Networks, Spectrum and Licensing)**

Telecom Regulatory Authority of India  
Mahanagar Doorsanchar Bhawan  
Jawahar Lal Nehru Marg (Old Minto Road)  
New Delhi – 110 002

**Subject : Vodafone Idea's Response to TRAI Consultation Paper on Licensing Framework for Establishing Satellite Earth Station Gateway**

**Reference : TRAI Consultation Paper dated 15<sup>th</sup> November 2021**

Dear Sir,

This is in reference to the consultation paper on T TRAI Consultation Paper on Licensing Framework for Establishing Satellite Earth Station Gateway issued on 15th November 2021.

Please find enclosed our comments on the questions raised in the captioned consultation on 'Licensing Framework for Establishing Satellite Earth Station Gateway'.

We request you kind consideration and support on our submissions.

Thanking You

Yours Sincerely,

For **Vodafone Idea Limited**.

**P Balaji**  
**Chief Regulatory & Corporate Affairs Officer**

Encl: As stated above

C1 – Vodafone Idea External



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**VIL Response to TRAI consultation Paper on  
Licensing Framework for Establishing Satellite Earth Station Gateway**

At the outset, we are thankful to the Authority for giving us this opportunity to provide our comments to the TRAI's consultation paper on Licensing Framework for Establishing Satellite Earth Station Gateway, published on 15.11.2021.

We would like to submit our comments to all the questions as follows:

1. VIL is in favour of licence amendments in relevant licences / authorizations that permit/enable the applicable licensed service providers for partnering with entities to establish Satellite Earth Station Gateway using shared infrastructure. This will enhance the provisioning of internet and voice services in remote / inaccessible areas at lower costs (on account of use of shared infrastructure), where terrestrial backhaul connectivity options are unavailable/unviable.
2. We recommend that there is no need to have a separate service license for establishing satellite Earth Station Gateway in India for the purpose of providing satellite-based resources to service licensees. If required, a registration based framework should be devised for them to provide infrastructure service to licensed service providers, on the lines similar to existing IP-I registration. Also, we recommend that scope should be enhanced under respective authorisations of Unified license to enable the provision of cellular backhaul connectivity via satellite through Commercial VSAT CUG/ GMPCS/earth station registration, using shared infrastructure.
3. The satellite providers who intend to establish Earth Station Gateway in India, should do so in partnership with respective service providers only. They don't have any case of providing any telecommunication services or for establishing of core network. There Earth station is required for providing bandwidth to respective service provider hence, there should not be any license but, should be allowed to establish earth station under partnership with an applicable licensed service provider.
4. VIL support the infrastructure sharing of earth stations/hubs and terminals installed under partnership with licensed service providers, for providing backhaul services to other licensed service providers, which will help reduce the cost of satellite based connectivity deployment.
5. Further, we also state that the requirement of having hub location to be in the same service area where licensed mobile operator's MSC is located should be removed. It can be provided that the terrestrial leased line/bandwidth connectivity requirement for connectivity of earth station / hub to core network of mobile operator such as MSC/BSC/RNC, is fulfilled through applicable licensed NLDO/access provider.
6. Further, the earth station/ hub in partnership with licensed service providers, should be allowed to be located anywhere in the country. In the backend, the VSAT hub will be connected to mobile operator's BSC/ RNC/GW through the terrestrial links/bandwidth. Thus, the scope of entity establishing earth station gateway remains restricted to non-provision of terrestrial bandwidth/leased lines.
7. It is submitted that necessary amendments can be made in the licence/authorizations of Unified License holders for permitting the infrastructure sharing of earth stations/hubs and terminals installed under the various Commercial VSAT CUG/ GMPCS licence/authorization by the NLDOs.