



No. ITU-APT/L/2023-24/853

February 7, 2024

To,

Chairman, DCC & Secretary (T)
Department of Telecommunications,
Ministry of Communications,
Sanchar Bhawan, 20, Ashoka Road,
New Delhi – 110001

Subject: Rationalization of Spectrum Usage Charges (SUC) pertaining to Satellite Communications

Reference:

1. WPC order no. R-11014/9/2001-LR dated 16th April 2003
2. WPC order No. P-11014/34/2009-PP(III) dated 22nd March 2012
3. WPC order no. J-19044/03/2015-SAT dated 28th June 2021
4. WPC order no. P-11014/34/2009-PP dated 11th December 2023

Dear Sir,

This is further to our letter No. ITU-APT/L/2023-24/852 dated February 5, 2024

The Indian Space Policy of 2023, complementing the vision of the Honorable Prime Minister, has opened new avenues for India's digital economy through space communications, allowing private SatCom players to offer commercial services. SatCom holds immense potential for broader socio-economic benefits, bridging the digital divide in remote areas, and addressing the country's disaster, maritime, and defense needs. Therefore, **it is imperative that regulatory levies are streamlined and minimized to fuel the robust growth of this industry.**

Regarding SatCom licensing, satellite-based services can be offered under the Commercial VSAT CUG, NLD, and GMPS authorizations of the Unified License. However, a disparity exists in terms of the SUC regime for SatCom. **While BSNL's services incur a 1% SUC of AGR as per the 2021 WPC order, the Commercial VSAT CUG is subject to 4% of AGR according to 2003**

WPC order. On the other hand, for VSAT/satellite-based services under the NLD authorization, Royalty Charges are determined using a formula-based charging mechanism under the 2012 WPC order.

In this regard, numerous TRAI recommendations from 2005, 2017, 2020, and 2021 have consistently advocated for a 1% SUC of AGR for satellite communications in both Commercial VSAT CUG and NLD services. Based on TRAI recommendations of 2018, the WPC has already specified a 1% AGR rate for SUC on BSNL's GSPS service. Given that the same satellite spectrum is being used under these authorizations, there is no reason to as why the same 1% SUC cannot be implemented in VSAT, NLD and GMPCS.

Therefore, we respectfully request the DoT/WPC to implement TRAI's recommendations of SUC at 1% across all service authorizations.

We trust that our submission will receive favorable consideration, and we look forward to appropriate actions being taken in this matter.

Thanking you,
Yours Sincerely,



Bharat B Bhatia,

President, ITU-APT Foundation of India

Vice Chairman - Asia Pacific, World Wireless Research Forum (WWRF)

Chairman, ITU-R WP5D SWG IMT Applications

Chairman, APT Task group on Wi-Fi and RLAN

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