

Cable and Satellite Broadcasting Association of Asia

Response to the Telecom Regulatory Authority of India “Consultation Paper on Allocation and Pricing for 2.3-2.4 GHz, 2.5-2.69 GHz & 3.3-3.6 GHz bands” dated 2 May 2008



The Cable and Satellite Broadcasting Association of Asia (CASBAA) is an industry-based trade association dedicated to the promotion of multi-channel television via cable, satellite, broadband and wireless video networks across the Asia-Pacific region. Member organizations include some 130 Asia-based companies building, operating, and providing content for pay-TV systems, and include operators of cable, satellite, mobile and IPTV systems. Members are physically located in 15 countries in the Asia-Pacific region, and have broad experience in building a dynamic industry to meet the rapidly-growing demands of the region's 3 billion people.

CASBAA and its member companies are advocates of prompt and efficient allocation of appropriate spectrum for wireless applications, including broadband wireless applications. We believe that our member satellite companies are in a position to benefit from growth of such services, as the satellite industry will be in a strong competitive position to attract the data “backhaul” required for these services.

However, we stress that the spectrum for these applications must be appropriate, and must not pose conflicts with the spectrum already in use for satellite services, especially in the C-band and Extended C-band. For that reason, we support use of the 2.3-2.4 GHz and 2.5-2.69 GHz bands. As discussed in the consultation paper, these bands have been identified by the ITU for use by next generation mobile technologies. Those bands offer significant scope for innovation with the potential for introduction of new technologies, services, applications and devices, and their potential should be fully explored.

CASBAA and its members, however, adamantly oppose further moves to assign spectrum in the 3.4-3.6 GHz bands to BWA applications. The ITU clearly noted that existing assignments in these bands must be protected. International experience in other countries, as well as a careful program of field testing^{*}, has demonstrated that allocation of spectrum in these frequencies to wireless applications will result in major interference problems with fixed satellite service receiving stations operating in the C-band. We understand that the conclusions of these international test results were reinforced by the Department of Space's own tests in India.

The situation of different countries in regard to existing uses of C-band varies widely. India's situation is demonstrably very different from that in North America, Europe or Japan. In India, the C-bands are in active and ubiquitous use throughout the country, delivering satellite services to cities and towns in every state. Receiving antennas are

^{*} Field Test report by the Satellite Users Interference Reduction Group (SUIRG), February 2008, annexed to this submission.

widely distributed, and as there is no licensing requirement for such antennas, the Authority has no definitive record of how many tens of thousands exist.

There is no way that use of these bands by wireless services could be conducted without severely impacting availability of C-band satellite signals. C-band satellite distribution offers affordable, high-availability coverage of very large geographical areas in tropical climate zones - such as India. Those signals carry, among other critical applications, broadcast programming that is conveyed by cable operators to 78 million Indian homes. We believe the Authority should recognize the importance of these uses of C-band to such a broad swathe of the Indian population, and also the growing body of evidence that assignment of adjacent frequencies – and not just in-band frequencies – to wireless applications is not compatible with continued operation of fixed satellite services. In light of continuing developments since the Authority's last consideration of these spectrum allocation issues, consideration of using the 3.4-3.6 GHz bands for wireless applications should now be discontinued.

Moreover, we are also concerned at the possibility that assignment of spectrum in the 3.3 GHz band for wireless services could also generate interference with adjacent C-band satellite services, and we would urge that before considering use of this band, technical studies should be conducted to confirm that and how wireless applications will not unduly interfere with satellite in 3.4-4.2 GHz. We are not aware of any studies on this issue that have taken place up until this time.

Should the Authority require further information about the international testing program referred to above, our Association would be pleased to facilitate contact with the international bodies which conducted the tests.

Hong Kong, May 16 2008