

Subject: Consultation Paper on Assignment of Spectrum for Space based Communication Services

Dear Sir,

This is in regards to the consultation paper “Assignment of Spectrum for Space-based Communication Services”.

India has approx 200+ new space startups coming up and most of them are building critical infrastructure for the future of the Indian space sector and our defence sector. As we are entering a new era of Indian dynamism and innovation, as catalysts of this space, it is our duty to make the process easy for the future innovators.

Space-based communication is built on shared spectrum resources. There are several reasons why administrative allocation is a suitable approach for the spectrum. Satellite communication is an inherently technically complex field, and auction-based models can lead to outcomes that are sub-optimal for the industry as a whole.

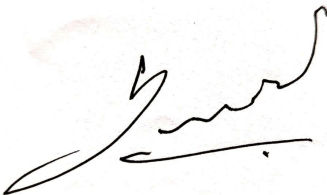
An administrative allocation can assist Indian companies, especially innovative startups to have discussions with the allocation team and decide case by case basis.

If we closely observe the global powers in space technology and communication, they all fuelled innovation through administrative allocation methods and created a seamless infrastructure for current and future innovation.

The cost of purchasing spectrum through an auction process can be prohibitive, making it challenging for smaller satellite companies to innovate and participate in the market. This can have a significant impact on the growth of the nascent space industry, especially new startups.

We kindly request you to consider the administrative allocation, especially to support the budding startups in the Indian space ecosystem.

Sincerely,



Krishna Nair

Kawa Space