

31 October, 2018

Sub: TRAI Consultation Paper on Methodology for levy of Spectrum Charges for provision of Satellite based Services using Gateway installed in India under 'sui-generis' category

We thank TRAI for the opportunity to participate in the consultation on "Methodology for levy of Spectrum Charges for provision of Satellite based Services using Gateway installed in India under 'sui-generis' category".

As BSNL Franchisee for GSPS Services, we, Northern Lights Securecom Pvt Ltd, have the opportunity to interact with users and potential users of these services, on a daily basis. Our comments on this consultation are based on their feedback.

Q No	Issues for Consultation	Comments by Northern Lights
1	Do you agree that the formula based spectrum charges should be replaced with AGR based SUC in respect of provision of services by BSNL under its license for "Provision and Operation of Satellite based services using Gateway installed in India" under 'sui-generis' category? If yes, what percentage of AGR should be the spectrum usage charges?	As BSNL Franchisee for GSPS services, we interact with users and potential users on a daily basis. Our comments are based on their feedback. a) The current annual spectrum charges are a serious impediment, even to the people with a critical need for these services. b) For any user, these services are meant for those areas or times, where/when no other telecom services are available. It is difficult to justify high SUC as a direct consequence of the inability of authorities to provide any other network in those areas/times (disaster etc). c) Therefore, in our opinion, there should be no SUC, because users are using these services at places or times, where/when no other network is made available to them.
2	In case your response to Q1 is negative, what should be the spectrum charges and how should it be calculated?	Not applicable.

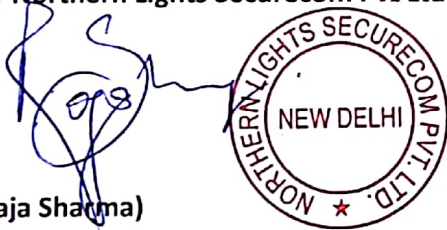



Q No	Issues for Consultation	Comments by Northern Lights
3	In your opinion, while determining the AGR for the purpose of levy of license fee and SUC, whether the cost of handsets (which is separately identifiable) should be allowed as deduction from the Gross revenue of BSNL's Satellite based services under 'sui-generis' category?	<ol style="list-style-type: none"> 1. Please refer to our response to Q1 above. Our opinion is that SUC should not be applicable on these services. 2. As for handsets, this revenue for BSNL is only to facilitate provision of BSNL GSPS service, the core business of BSNL.
4	If there are any other issues/suggestions relevant to the subject, stakeholders may submit the same with proper explanation and justification.	<ol style="list-style-type: none"> 1. The geographical areas having the maximum need for these services are unfortunately designated "barred areas". Now with the gateway available in India with LIM facility, all areas should be unbarred, so that users everywhere are able to take advantage of this technology. 2. Import of spares and accessories should be allowed freely without restriction. 3. Inmarsat being a global service, it should be possible for international travellers to be able to use these services from anywhere.

Thank you once again.

Yours sincerely

for Northern Lights Securecom Pvt Ltd



The image shows a handwritten signature in blue ink, which appears to be 'Raja Sharma'. To the right of the signature is a circular red stamp. The text inside the stamp reads 'NORTHERNLIGHTS SECURECOM PVT. LTD.' around the perimeter, with 'NEW DELHI' in the center and a small star symbol at the bottom.

(Raja Sharma)
Director