To: TRAI
From: Sahara India TV Network

SUB: COMMENTS ON CONSULTATION PAPER DATED 2 MAY 2008 ON ALLOCATION AND PRICING FOR 2.3-2.4 GHz, 2.5-2.69 GHz & 3.3-3.6 GHz. BANDS

Dear Sir,

This is with reference to your above-mentioned consultation paper. We are Owner and Broadcaster of 10 TV Channels including 7 No's of News and Current Affairs Channels and 3 No's of Entertainment Channels through our Teleport located at Noida,UP. Our comments on subject Consultation Paper are appended below:

Background:
Although our Frequency bands used for Broadcasting and Digital Satellite News Gathering (DSNG) are beyond the 3.3-3.6 GHz. Band but we want to place our concerns on record regarding your recommendation on use of 3.3-3.6 GHz. Band for BWA applications. As per your recommendations dated 27 September 2006 to Government," The DOT should coordinate with Department of Space to get 100 MHz. for Broadband Wireless Applications in the 3.4-3.6 GHz. Band immediately." Authority also recommended allocation of 200 MHz. of Spectrum in the 3.3 to 3.4 MHz. & 3.4 to 3.6 GHz bands to 13 Operators in contiguous band of 15 MHz. each.

DOT in it's guidelines, however, stated that allotment of spectrum in the 3.4 to 3.6 GHz. Band will be considered after assessing the compatibility with Satellite based services. Authority has proposed to revisit the reserve price for the spectrum in the 3.3-3.6 MHz band in Consultation Paper mentioned above.

Comments:

1. TRAI has agreed vide para 2.8 and subpara titled **"2.3-2.4 GHz Band"** that 2.3-2.4 GHz band is more suitable for Broadband Wireless Access (BWA). I quote,"Since this band is lower than 3 GHz., the propagation characteristics make for lower expenditure associated with network deployment. In addition, lower frequencies for the mobile terminal result in lower power requirement for a given propagation distance.

   As a result band of 2.3 to 2.4 MHz. is more suitable for mobile broadband wireless access than other frequencies e.g. 3.4 to 3.6 MHz."

2. Previously only 3.3 to 3.6 GHz band was available for BWA services, which as per your own recommendations is suitable for fixed and nomadic Wireless Access (Broadcast and Satellite News Gathering services are also of this nature). Now additional frequency bands of 2.3-2.4 GHz and 2.5-2.65 GHz have been made available for allocation for BWA, therefore, 3.4-3.6 band should be retained for Satellite services.
3. Frequency Band 3.4-3.6 GHz lies in the Downlink Frequency band of Satellite Services. There is a corresponding Uplink band, which is higher from Downlink band by 2.225 GHz. If 3.4-3.6 GHz band is barred from Broadcast/Satellite Communication services then it will result in wastage of corresponding Uplink band of 5.625 to 5.825 GHz. Since uplink band is quite high frequency it can't be utilized for Mobile Communication. Thus effectively Satellite Communication will loose 400 MHz of frequency band with no use of upper 200 MHz for Mobile Communication services.
4. 3G services involve virtual wastage of precious frequency spectrum as it involves point to point communication. Further, how many persons will want to spend extra money to use extraneous services like Mobile TV on small handheld screen is still open to discussion as 3G services have not been successful in many countries excluding Korea and Japan.
5. Satellite Broadcast has proven to be the best system for distribution of TV signals as it involves point to multi point Communication covering the entire footprint area of the satellite. Crores of Indian population enjoys Satellite/Cable TV and there is great demand for new TV channels due to diversity of language and culture in our Country. Reducing the spectrum available for Satellite services will strangle the future growth of this vital and essential service and also cause heavy loss for Satellite Service Providers who have Transponder capacity in 3.4-3.6 GHz band. This will also result in disruption of services of Broadcaster who are in 3.4-3.6 GHz band.

In view of above factors, you are requested to recommend continuing use of 3.4-3.6 GHz band for Satellite services and spare Broadcasters, Satellite Service Providers, VSAT service providers and other related parties from heavy losses. This will also pave path for future growth of Satellite services.

Thanking you,

With warm regards