Taj Television India Pvt. Ltd.
403, Manish Commercial Centre
Dr. A. B. Road, Worli, Mumbai - 400 030. INDIA
Phone : 91 22 66623101- 03 Fax : 91 22 66626290

May 23, 2008

To,
Mr. Sudhir Gupta, Advisor (MN)
THE TELECOM REGULATORY AUTHORITY OF INDIA
Mahanagar Doorsanchar Bhawan,
(next to Zakir Hussain College)
Jawaharlal Nehru Marg
(Old Minto Road),
New Delhi-110002

Ref.: Consultation Paper on Allocation and Pricing for 2.3-2.4 GHz, 2.5-2.69 GHz & 3.3-\3.6 GHz band - Consultation Paper No. 8 /2008 Dated May 2, 2008

Dear Sir,

Taj TV's "Ten Sports", the most watched sports channel in the sub-continent , is available in more than 50 million cable/satellite homes worldwide. The world's biggest producer of cricket, the Channel broadcasts cricket from Sharjah, West Indies, Pakistan, Sri Lanka, South Africa and Zimbabwe throughout the Indian sub-continent and Asia, as well as to the United States and Canada (Cricket Plus), the Middle East and North Africa. Ten Sports also owns the exclusive rights in its sub-continent territories for the WWE, the UEFA Champions League, the US Open tennis and Hockey World Cup.
"Ten Sports" is uplinked from Dubai and We distribute "Ten Sports" through Satellite receive earth stations operating in the C-band though Satellite -Intelsat 10.

"Ten Sports " would like to thank the Telecom Regulatory Authority of India ("TRAI") for the opportunity to participate in this public consultation " the allocation of frequencies within the 3,300-3,600 MHz band for broadband wireless access ("BWA") services".

In India, the 3,400-4,200 MHz frequency bands (commonly referred to as Extended C-band and Standard C-band frequencies) have long been used by satellite operators. Today, there are more than 150 satellites operating and providing essential and critical services to consumers using C-band frequencies, . In addition to distribution of channel and broadcast programming, other companies also use the same for data transmission services, and telephone and internet connectivity services for millions of users. At the same time, satellite services in the C-band help to enable public policy objectives such as safety (emergency services) and cultural issues (broadcasting). Many Indian entities depend on and benefit from the various advantages of satellite communications.

Considering above, it is very essential that that satellite systems and the users of such systems continue to be able to use C-band frequencies without harmful interference from terrestrial wireless access systems .

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The concerns with the use of C-band by stand-alone terrestrial fixed wireless systems, including IMT, derive from the harmful interference that would be caused to the numerous, established satellite systems operating in these bands. In this regard, it is important to underline that the interference problem generated by fixed wireless access systems, such as BWA and IMT, is not limited to co-frequency band operations among these services, but also relates to the harmful effects from deployment of these new terrestrial systems in adjacent bands -- for example, a terrestrial system operating in the 3,300-3,400 MHz band interfering with satellite receive earth stations operating in bands above 3,400 MHz.

It is particularly important to emphasize that the earth stations of satellite systems that today use C-band frequencies do so in reception mode and, therefore, are extremely susceptible to harmful interference and receiver overdrive (*e.g.*, causing total loss of service, blackouts, synchronization loss and signal delays) generated by transmissions in co-frequency or adjacent frequency bands. Deployment of stand-alone fixed BWA systems in the same geographic area and in the same or adjacent C-band frequencies in which satellite systems operate, substantially compromises the operation of satellite receive earth stations, rendering them inoperable and thus depriving consumers of service.

"Ten Sports" therefore recommends that deployment in this band is not considered until the desired protection of FSS reception in the 3 400-4 200 MHz band has been demonstrated. We further hope that TRAI's policies will reflect the strong concerns of the satellite industry -- as evidenced by the results of WRC 07 -- with respect to in-band as well as adjacent band interference from terrestrial services to FSS systems.

"Ten Sports " request the TRAI to consider the utilization of other available frequency bands for the deployment of terrestrial wireless access services in India. To the degree that TRAI decides to move forward with deployment of BWA and other terrestrial wireless systems in the lower portions of the C-band, we would request that strict out-of-band emission limits are imposed on such systems in order to protect the critical and widespread FSS services already deployed in the higher portions of the C-band.

We thank the TRAI again for the opportunity to comment on the Consultation Paper, and look forward to your feedback on the above and your views on the future plans with regards to the allocation of C-band frequencies in India for BWA services.

Respectfully,
For, Taj Television (I) Pvt. Ltd.

Hardik Shah
Head- Finance