2 May 2024

Shri Akhilesh Kumar Trivedi
Advisor (Network, Spectrum and Licensing)
Telecom Regulatory Authority of India (**TRAI**)
New Delhi-110002

Email: advmn@trai.gov.in

Subject: Consultation Paper on Auction of Frequency Spectrum in 37 – 37.5 GHz, 37.5 – 40 GHz, and 42.5 – 43.5 GHz bands Identified for IMT

Dear Sir,

Viasat is pleased to provide comments on the Telecom Regulatory Authority of India (**TRAI**) consultation paper on "auction of frequency spectrum in 37 – 37.5 GHz, 37.5 – 40 GHz and 42.5 – 43.5 GHz bands for IMT", (the "**Consultation Paper**").

Noting that the Department of Telecommunications has decided to make available the band 37.5 – 40 GHz and 42.5 – 43.5 GHz for IMT shared with satellite gateways with suitable protection, Viasat would like to provide comments on section H "*Coexistence of IMT and Satellite Earth Station Gateways*' for questions 11 and 12.

Viasat's 7th Global Xpress satellite (**GX-7**) is planned to cover the Asia Pacific region. GX-7 has higher capacity than previous GX satellites and will operate its feeder links in the Q-band (37.5 – 40.5 GHz) and V-band (47.2 – 50.2 GHz and 50.4 – 51.4 GHz) in addition to Ka-band (17.7 – 20.2 GHz and 27.5 – 30.0 GHz).

Sharing between IMT and satellite gateways in Q- and V-band is highly feasible considering the small separation distances required to avoid interference, coupled with the relatively limited number and known locations of satellite gateways and the expected use of international mobile telecommunications (**IMT**) for providing additional capacity in limited areas.

TRAI should take measures to ensure that operation of satellite gateways in these bands is not artificially constrained by the licensing approach for IMT. The licensing approach described in the Consultation Paper for 27.5 – 28.5 GHz frequency range would be suitable to avoid such constraints. A protection distance between IMT stations and Satellite Earth Station Gateways should be prescribed. Based on the WRC-19 studies referred to in the Consultation Paper, 4 km would be a safe protection distance.

Your Sincerely,

Cristian L. Gomez

Senior Director
Government and Regulatory Affairs
Asia Pacific, Viasat Inc.
cristian.gomez@viasat.com
www.viasat.com