Digital Communications India Forum (DCIF)
(A Unit of PTC India Foundation)

File no: DCIF/Technology Committee/20/7/26/03

To,
The Joint Secretary (Telecommunications),
Department of Telecommunications,
Ministry of Communications, Government of India,
Sanchar Bhawan, 20, Ashoka Road,
New Delhi- 110001

Date: 20th July 2026

Subject: Submission of the Digital Communications India Forum (DCIF), a Unit of PTCIF, on the Draft Telecommunications (Spectrum Assignment by Administrative Process) Rules, 2026 dated 17th June, 2026

Ref: Draft Telecommunications (Spectrum Assignment by Administrative Process) Rules, 2026, published by the Department of Telecommunications

Respected Sir,

Please find enclosed the comments of the Digital Communications India Forum (DCIF) on the Draft Telecommunications (Spectrum Assignment by Administrative Process) Rules, 2026.

The comments have been prepared after a detailed review of the draft Rules by DCIF's Technology Committee. The document reflects a balanced approach that supports the timely and transparent administrative assignment of spectrum, particularly for SatCom services, while ensuring robust safeguards relating to national security, sovereign governance, level playing field among operators, and long-term policy stability.

The comments further reiterate the need for open and non-discriminatory access to Mobile Satellite Services spectrum in the L & S bands, clarity on the assignment process for N-GSO satellite systems, robust cross-border coordination mechanisms, a suitable appeal and review mechanism, and forward-looking provisions to accommodate emerging technologies such as 6G, HAPS, AI, and Software Defined Radio in satellites.

We trust that the enclosed comments will assist the Department in finalizing a progressive, secure, and future-ready regulatory framework. DCIF would be pleased to provide any further clarification or participate in stakeholder discussions, as may be required.

Thank you for your consideration.

Thanking you,
Sd-
Yours sincerely,
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Administrative Assignment of Spectrum: DCIF Comments

The Digital Communications India Forum (DCIF) is thankful to DoT for publishing the draft Rules for Administrative Assignment of Spectrum, which is the need of the hour for the country as a whole.

DCIF is a Unit of PTC IF (Pacific Telecom Council India Foundation), the oldest telecom industry association in India (since 1994). It operates as a 'not for profit' Society and tries to put forth industry views and requirements in a pragmatic manner. A large number of former, senior DoT Officers are members of DCIF.

The Administrative assignment of spectrum for SatCom Services is the global norm. In India, SatCom services are the lifeline of remote & difficult areas, island communities and many other areas having various challenges, besides for emergency communications during natural calamities, etc.

India has made extensive strides in terrestrial phone & broadband connectivity, especially through cellular wireless services. Still, we have significant amount of area and population, which does not have appropriate telecom connectivity. The Government is providing various incentives to provide phone & broadband services in these areas, including through subsidised SatCom services. Even IMT has a Sat Component, and all Telecom Service Providers are now trying to include SatCom services in their bouquet of services.

In view of above, SatCom services in the country need to be encouraged and facilitated, similar to what was done for cellular mobile services in the beginning of this Century, which yielded tremendous socio-economic benefits for the nation as a whole. We strongly believe that Government's encouragement for SatCom services at this juncture, while duly protecting national security and sovereignty, will bring similar socio-economic benefits, through large growth, volume & affordable tariffs (present tariffs are quite high even by global standards, needing large subsidy for remote rural and difficult areas). This can be achieved by healthy competition through multiple SatCom Operators and preferential treatment for indigenous products/ devices.

Some comments for specific parts of the draft Rules are given below.

Item 16 (i) on page 80 Spectrum for SatCom in L & S bands: These draft Rules gives an impression that these mobile satellite services will be allowed for BSNL only. We recognise and appreciate the role of BSNL for rural and remote areas, yet in principle, and for level playing field, all services should be open to all Operators (spectrum for Mobile Satellite Services in L & S bands being limited, only a few telecom Operators can be accommodated). Further, a healthy competition will bring tremendous benefits on all fronts. Spectrum charges for all Operators should also be same. The Hon'ble Supreme Court had also directed in 2011 (2G spectrum case) that government policies should be applied uniformly to all service providers, without discrimination.

Spectrum for N-GSO satellite systems: It is presumed that spectrum for N-GSO LEO Satellite systems will also be assigned through the administrative process. This aspect does not appear to be fully clear in the present draft text. A clarity in this regard will help.

Coordination issues: Various coordination issues, specially the cross-border coordination, wherever required, should be included in the spectrum assignment appropriately.

Use of equipment with Software Defined Radio (SDR): Use of SDR equipment, if any, should also abide by the spectrum assignment conditions.

Leasing and/ or sharing of Administratively Assigned Spectrum: Leasing and/ or sharing of administratively assigned spectrum should not normally be allowed. Any unused/ inefficiently used spectrum should come back to Govt. Suitable periodical review to ensure efficient use of the assigned spectrum should also be built in.

Appeal & review Mechanism: Suitable appeal and review mechanism may kindly be included in these Rules.

Future technologies: The Rules should take into account foreseeable technologies like 6G, HAPs, AI, SDR in satellites, etc. so that the Rules don't require multiple amendments during next 20 years' time.

We will be happy to provide any further information, as desired, and/ or a chance to meet and explain our view points.

Vipin Tyagi
Chairman, Technology Committee,
Digital Communication India Forum

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