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From: GK <GK@aahtak.com>
Date: May 16, 2008 6:43 PM
Subject:
To: sudhirgupta@traf.gov.in

Date: 16th May 2008

Mr Sudhir Gupta, Advisor (MN)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg
Old Minto Road,
New Delhi-110002.

Sub: Consultation Paper on Allocation and Pricing for 2.3-2.4 GHz, 2.5-2.69 GHz & 3.3-3.6 GHz bands

Dear Sir,

TRAI issued the captioned consultation paper dated 2nd May 2008 soliciting the comments from the stakeholders on issues like Eligibility for allocation, Maximum amount of the spectrum to each bidder and pricing related to the spectrum bands (2.3-2.4 GHz and 2.5-2.69 GHz) along with the need for revisiting of pricing of 3.3-3.6 GHz spectrum band in view of the technological advancement in recent past.

On perusal of the said consultation paper, we would like to bring out the under mentioned areas for the consideration of TRAI:

1. We are using the bandwidth on 3.4 to 3.7 band in Intelsat-7 for our DSNG operations whereas our Uplink is on Intelsat-10. Intelsat-10 and Intelsat -7 are collocated satellites, which help us to share the facilities like Antenna and downlink setup, operational easiness for 2 way communication and simultaneous telecast on both sides. It's not practically possible to vacate the spectrum unless compatible bandwidth is available on regular C Band. To our knowledge more than 70 broadcasters are desperately looking for bandwidth in regular C Band and no satellite is expected to be launched with substantial capacity in regular C Band for another 2 years.
2. To our knowledge, non-interference aspect has not been proven by experiments so far. Even outside band (above 3.6) is likely to be affected due to high power terrestrial transmission on the proposed band (3.3 to 3.6 GHz)
3. As a broadcaster we are willing to consider vacating the bandwidth as and when alternate bandwidth is made available by our satellite provider with the same cost.
4. As is evident by studies carried out Internationally allowing Broadband Terrestrial services like WiMAX etc. which transmit very strong signals, to operate in 3.4-3.6 GHz band causes severe interference in the wireless based services and as a result adversely affect the quality of the signals of the broadcast. Any interference and disruption in the television programmes could deny the services to almost half the population of the country which may not

be in larger public interest as Television has more penetration and has reach in every nook & corner of the country as compared to the broadband services.

5. Further TRAI with November 21st 2007 guidelines identifying the band 3.3-3.4 GHz for BWA has itself admitted that the same could be done only after assessing the compatibility with the Satellite based operations. We observe that in the consultation paper it is not clear whether the government has carried out such satellite compatibility assessment and thus we may be able to offer our specific comments only after TRAI comes out the compatibility aspect.

6. We understand that if additional frequency in 3.4. - 3.6 band is allocated for IMT which is presently used by satellite based operators, that may adversely affect the availability of frequency to the existing operators and may affect their business adversely.

In view of the above, we would request you to kindly keep the said notification in abeyance and carry out detailed consultations with all the stakeholders so that the old and essential satellite based services are not made to shift to another part of the spectrum and suitable solutions are found for the entry of services like WiMAX.

Thanking you,

Yours faithfully,

For TV Today Network Ltd.

G. Krishnan

Executive Director & CEO

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