

Draft Space Based Communication Policy of India -2021: Comments by ISpA

1. At the outset, we thank the DoS for the opportunity to provide comments on the draft Space Based Communications Policy of India-2021 (**"Spacecom Policy 2021"**).

Introductory Comments

2. The Draft Spacecom Policy-2021 is a well-made document with excellent intentions of opening the Space Sector for Private players. With advent of INSPACe and ISpA, the whole process has been given a wide impetus which Indian Industry welcomes wholeheartedly.

3. The Draft has been fully scrutinized which included in-house brainstorming with Industry Members as well as experts who have been working in the Satcom area. The ISpA has collated from inputs received from a wide variety of experts and industry which would include R&D, Production, Installation and Operators as well as Consultants who have been professionally associated with ISRO.

Important Recommendations

4. The Draft Policy is forward looking and would help to foster the participation of the private sector in providing space-based communication in India and in foreign countries. Further, support for "ATHMANIRBHAR BHARAT" in Space Sector would be key to make India a Great Space Power as per the Vision of the Hon' ble Prime Minister. To facilitate the noble objectives of Policy, a summary of recommendations of ISpA for considerations by DoS, are as follows:-

- (a) **Time-bound Approvals.** One of the most important aspect is the need for speedy approval. It is recommended that clearance may be deemed approved unless negated within three months by concerned

government agencies to whom IN-SPACE would forward the Industry proposals for approval.

(b) **Single Window Mechanism.** IN-SPACE may be designated as the Single-Window for all Government of India approvals for subjects mentioned in the Draft Policy. IN-SPACE could interface with other Government Departments which would include, DoS, ISRO, DoT, TRAI and MoIB as well as any other department, where considered necessary, by IN-SPACE. It is recommended to include a mechanism for monthly inter-departmental meeting of all stakeholders to facilitate fast track review and approval of proposals.

(c) **Transparent Tracking Mechanism.** Web-based Portal for submission of application and monitoring of progress of approval would go a long way in bringing transparency.

(d) **Reconsideration of Para 6.7.5.** The Draft proposes to bring GSO Non-Indian Orbital Resources under Indian Administration. This aspect may be reconsidered as the orbital slots are given to Operators through their respective Country Filing and no Foreign Country would agree to let go of their Orbital Slots or abide by Indian regulations.

(e) **Awareness of GoI policies, ISRO facilities & Resources.** A web-portal based transparent mechanism to facilitate Awareness and Actionable Information to include following needs to be created :-

- (i) Policies and Funding Resources of GoI.
- (ii) Information on ISRO facilities for testing, calibration, validation etc. in terms of availability, booking status, costing to facilitate better resource utilization.
- (iii) Technologies available for ToT.

(f) **Insurance of Space Assets.** The cost of Insurance would be prohibitive for private industry, specially Startups. Even for other large players there would be a need to create an insurance pool to facilitate insurance. The insurance mechanism for the Nuclear liability post 2005 Nuclear Power Sector Liability Act took a long time to get established. Similar mechanisms may be considered as a precedence by facilitating creation of a National Space Insurance Pool.

(g) **Level Playing Field for Private Indian Player vis-à-vis PSUs/CPSE** may be considered for meeting requirements under Para 9 ‘**Strengthening Research and Development and addressing Strategic and Societal communication requirements**’. This could be done by making the Industry as a Co-Traveler and bringing more investments in R&D, especially in the non-sensitive system/sub-system category.

(h) **Request for Clarity on Requirement of Fresh Authorization on Change of Ownership.** It is submitted that change of ownership should not result in requirement of a new authorization in an ideal case. However, if still necessary than extent of change of ownership that requires fresh authorization may need to be defined. This would include clarity on change of part ownership (such as increase/decrease of shareholding) which would not require a fresh authorization.

(j) **Incentivization** of Indian Space Industry: -

(i) Setting up of hardware manufacturing for upstream/downstream segments through schemes like M-SIPS which may provide: Capital Subsidy- 20% for investments in Plant & Equipment in Special Economic Zones (SEZs) and 25% for Plant & Equipment in non-SEZs for both new units and expansion units.

- (ii) Tax and other incentives for export promotion and for R&D.
- (iii) Production Linked Incentive (PLI) scheme for Space Sector which should give at least 5%-10% incentive to companies on their manufacturing, be it for exports or domestic consumption.
- (iv) Consider time bound preference for JVs between Indian Companies and Foreign Companies to promote ToT; R&D; Capability & Capacity Development; and Operations to Leapfrog growth.
- (v) Government Owned-Corporate Operated Model for Strategic Sector may be considered.
- (k) **Policy Interpretation.** IN-SPACE board, shall within the ambit of Space policy, have authorization to interpret and clear cases that donot strictly fall within the definitions listed herein in the policy.
- (l) **Reconsideration of para 6.7.6.** This clause may be reconsidered as it takes away the certainty that a granted license is supposed to give, by making an opening to potentially revoke an already granted license, based on issue coordination.
- (m) **Interference Monitoring capability (refer para 6.7.7).** Considering the heavy investment involved in setting up of Interference Monitoring infrastructure, sites for this purpose are carefully identified based on various technical aspects including geographical considerations. Hence, operators may be allowed to undertake interference monitoring from their existing sites. Commitment may be taken from them regarding compliance as stated in para 6.7.4 along with technical report to validate the same.

5. Though not directly covered within the ambit of the present draft Spacecom Policy, two critical aspects for growth of Space Communication Sector would include, (1) Method of allocation of Space Spectrum; and, (2) criticality of 27.5-28.5 MHz Band. DoS and IN-SPACe are requested to consider these aspects with due sensitivity and as per best international practices to facilitate growth of Space Communication in India.

5. Additionally, it is felt that there could be a requirement to establish an appellate mechanism on the lines of TDSAT for the Space Sector.

6. A summary of detailed comments by the industry along with certain clarifications sought, as received from Industry Members, are placed at Annexure. In these, the important aspects have been highlighted for consideration along with clarifications, where applicable.

7. ISpA requests positive consideration of the recommendations and include these in the Implementation Guidelines under the Policy, when they are released by DoS.

Consolidated Feedback of ISpA Members on Draft Spacecom NGP

1. Important Terms

“Indian Entity. Indian Entity include (i) Individual citizen of India (ii) Partnership established under the Partnership Act or Limited Liability Partnership Act (iii) Association of persons or body of individuals incorporated in India (iv) Company incorporated under the Companies Act (v) Any Department or Undertaking of the Central or State Government or body corporate incorporated under the relevant statutes (vi) any other entity that may be specified by the Government of India.”

Comments/View

All the liability/obligations of the satellite operator are to be met by the Indian entity. Indian entity has to be a Company incorporated under the Companies Act – This is consistent with international best practices where countries like US, UK and others set this as a condition for obtaining an authorisation.

2. **Para 3(iv).** provide a timely and responsive regulatory environment for the Indian Entities to establish and operate space based communication systems.

Comments/View

Clearance should be deemed approved unless negated within 3 months by concerned govt agencies.

3. **New Addition as Para 3 (v).** Encourage Development of technological capabilities and capacities of Indian entities through increased R&D activities and technical collaborations including formation of any special purpose vehicles with foreign entities wherever required.

4. **Para 4.1.** Department of Space (DOS) & Indian Space Research Organisation (ISRO), in the efforts to achieve end-to-end capabilities, have nurtured Indian industry as partners while realizing launch vehicles and satellites. Thus enabled Indian industry to acquire skill-set and capability to realize the sub-systems and satellite systems meeting the stringent specifications and reliability.

Comments/View

Enhanced support and cooperation for private sector in optimum use and involvement of ISRO human resources, expertise, facilities and infrastructure in commercial space activities.

5. **Para 4.2.8.** obtain authorisation for establishment and operations of space system and provide satcom capacity to service providers, without requiring further permissions/clearances from IN-SPACe.

Comments/View

Proposals from Satellite Operators of foreign or International Satellite Systems having JV with reputed companies of Indian Origin shall be given preference for Authorization and the Utilization.

6. **Para 4.3.** The Indian service providers shall avail the space based communications only on the authorised space assets, subject to fulfilment of communication service licensing requirements, as applicable.

Comments/View.

(a) The principle of compliance with ITU RR in particular ITU Coordination and Notification Process for Space Systems shall form the essential basis for Authorization.

(b) We understand that the Authorised Space Assets may belong to an Indian Entity or it may belong to a non-Indian entity as well. This is because more than 50% of the Satellite transponders used today by the Service Providers in the country to serve the needs of the Indian users are on foreign satellites. We also understand that the existing foreign Satellites on which the Service providers in the country are using currently, will not require any separate authorisation. We request confirmation on the above understanding.

7. **Para 5.2.** The use of space assets for communication in any frequency of electromagnetic spectrum, to or from Indian Territory, be permitted through authorisation. The authorisation addresses use of Indian orbital resource, non-Indian orbital resource, use of owned or leased space systems.

Comments/View

(a) We understand that as per this clause, the Indian Service providers can lease Satellite transponder capacities on Indian as well as non-Indian Space Asset. Please clarify. Moreover, as this allows all frequencies of electromagnetic spectrum, this needs to be carried forward in the licensing framework of Dept of Telecommunication as referred in 6.8.2 and 6.8.3 of the draft Spacecom policy 2021.

8. **Para 5.4.** An Indian entity which owns and operates a space system shall be liable for any potential damages caused to other space systems or objects in outer space and its environment. This obligation shall be fulfilled by the Indian Entity by providing a financial guarantee or insurance cover to a sum, as determined by IN-SPACe by taking into account the risks involved in nature and operations of that space system in outer space.

Comments/View

The cost of Insurance would be prohibitive for private industry, specially Startups. Even for other large players there would be a need to create an insurance pool to facilitate insurance. The insurance mechanism for the Nuclear liability post 2005 Nuclear Power Sector Liability Act took a long time to get established. Similar mechanisms may be considered as a precedence by facilitating creation of a National Space Insurance Pool.

9. **Para 5.5.** Indian National Space Promotion & Authorisation Center (IN-SPACe), constituted by Government of India, under Department of Space (DOS), shall accord necessary authorisations for all space assets for communications to or from Indian Territory as per the applicable acts, regulatory provisions & exemptions and statutory guidelines.

Comments/View

The clause 5.6 states that IN-SPACe as nodal agency shall prescribe the authorisation process, however, these processes are not provided as part of the policy. We request that the broad guidelines of the authorisation processes be defined as part of the Spacecom policy, which will ease the understanding of the overall policy and avoid help in avoiding gaps. Moreover, it is recommended that a time-frame be defined regarding such authorisations to be firmed up through a consultation process involving the industry and the other relevant stake-holders.

10. **Para 6.** Authorisation and Authorisation Process

Comments/View

Permissions / Clearances: This is the biggest bug-bear of any Policy document. With a view to get out of the inherent delays in any bureaucratic system we suggest that Para 6.8 of the Draft Policy may be simplified considerably by making INSPACe the single authority, who should constitute a Standing Committee consisting of senior reps of various wings of Government of India, such as MOIB (Para 6.8.1), DOT (Para 6.8.2), DCPW (Para 6.8.3) and suitable Industry reps from ISpA to meet once a month and take decisions to clear the proposal, which should be binding on all concerned Ministries / Officials. This “Single-Window”, we feel, is essential to make the Policy successful. Above Committee may also be given responsibility to co-ordinate / solve any other inter Departmental issues which may delay the implementation of Spacecom Policy 2021.

11. **Para 6.2.** Authorisation shall be accorded for establishment and operations using owned or leased space asset for communications over India and/or outside India, using Indian or Non-Indian orbital resource(s).

Comments/View

As per 6.2, Authorisation shall be accorded for establishment & operation of space asset using owned or leased space asset for communications over India and/or outside India, using Indian or Non-Indian orbital resource(s). We understand that as per this clause there is no specific restriction to a non-Indian entity with respect to establishment & operations using owned or leased Space Asset. Authorisation can be accorded to an Indian or a non-Indian entity. Please clarify.

12. **Para 6.4.** Authorisation is required for establishment of space asset for communication outside India as long as it is operated as an Indian space asset.

Comments/View

(a) The clause 6.5 states that “any space system realised in India, but operated as a foreign owned space system, without any liability to Government of India, does not require authorisation of IN-SPACE”. We request to provide clear definition of “Space systems **realised** in India”. We understand that “Space systems realised in India” means any Space System already available for use in India and/or being used in India for offering communication services, but operated as a foreign owned Space System. As such no authorisation is required for such Space Systems. Currently Indian service providers use more than 50% satellite capacity on foreign satellites procured through NSIL/Antrix. We understand that as per clause 6.5, the foreign satellites will continue to provide satellite capacities to Indian service providers without any change & will not require a separate authorisation from IN-SPACE. Moreover, the Indian service providers will be able to procure satellite transponder capacities on these Space Assets directly. Please clarify if our understanding is correct.

(b) Is this applicable to satellite manufactured in India but not operated by Indian entity (operated outside India & exported). We understand that this does not need InSPACE Authorisation, but it does not grant it right of communication over India. Right of communication is covered under Cl.6.2

13. **Para 6.5.** Any space system realised in India, but operated as a foreign owned space system, without any liability to Government of India, does not require authorisation of IN-SPACE.

Comments/View

Is this applicable to satellite manufactured in India but not operated by Indian entity (operated outside India & exported). We understand that this does not need InSPACe Authorisation, but it does not grant it right of communication over India. Right of communication is covered under Cl.6.2

14. **Para 6.6.1.** Establishment of space asset for communications over India using Indian orbital resources.

Comments/ View

May be reworded as “Establishment **and/or utilization** of space asset for communications over India using Indian orbital resources.”

15. **Para 6.6.2.** Establishment of space asset for communications over India using Non-Indian orbital resources.

Comments/ View

May be reworded as “Establishment **and/or utilization** of space asset for communications over India using Non-Indian orbital resources.”

16. **Para 6.6.4.** Establishment and/or utilization of NGSO space asset for communications over India.

Comments/ View

(a) GSO and NGSO space assets need to be treated at par.

(b) We need to understand if IN-SPACe shall prescribe the authorisation process for “Establishment and/or utilization of NGSO space asset for communications over India” for Indian Entities only or for foreign entities as well. We request clarity on this please.

17. **Para 6.7.5.** Use of Non-Indian orbital resources by GSO space systems shall be permitted subject to an appropriate arrangement by which such orbital resources are eventually brought under Indian administration, through Indian ITU filing. The authorisation requires a satisfactory commitment by the applicant through an appropriate arrangement with the concerned foreign administration which has the priority for the use of the proposed orbital resources. In case of a leased space asset, apart from the applicant, the space system operator of such asset and the concerned foreign administration shall also agree and commit for the arrangement of bringing the orbital resources eventually under Indian administration.

Comments/ View

(a) GSO and NGSO have to be treated at par. Today GSO satellites are cheaper to operate and within the reach of many Indian startups. A stipulation that requires transfer of non Indian orbital resources to

Indian Administration only for GSO may be unjust. Either it should be equally enforced for GSO/NGSO or it should be done away for both. The ITU does not have a process for transfer of orbital resources from one country to another. Also, the NGSOs today are operated by large corporations. This will put the smaller GSO operators at a disadvantage if they have to bring the non Indian orbital resources to the Indian administration. Additionally, there should be incentives for foreign companies to launch/build satellites out of India using Indian orbital resources. They have to be incentivised in terms of period of lease, unrestricted access to all market segments as opposed to short term leases and restricted market access to players who do not intend to bring orbital resources or file from the Indian administration.

(b) Registration is fine from Security Perspective. Denial of Leasing of assets.

(c) **May be reworded as** “Use of Non-Indian orbital resources by GSO space systems shall be permitted subject to an appropriate arrangement by which such orbital resources are eventually brought under Indian administration, through Indian ITU filing **or through any other means in accordance with ITU**. The authorisation requires a satisfactory commitment by the applicant through an appropriate arrangement with the concerned foreign administration which has the priority for the use of the proposed orbital resources. In case of a leased space asset, apart from the applicant, the space system operator of such asset and the concerned foreign administration shall also agree and commit for the arrangement of bringing the orbital resources eventually under Indian administration.”

(d) As per this clause, we understand that this clause is only applicable in case of new Space Asset, owned or leased, and is established by Indian Entity using non-Indian Orbital Resources. In case such Space Asset is established by a non-Indian entity using non-Indian Orbital Resource, then this clause is not applicable. We request clarity on this please. With respect to leased space asset, the clause requires the space system operator of such asset and the concerned foreign administration to also agree and commit for the arrangement of bringing the foreign orbital resources eventually under Indian administration. This may not be possible and will be difficult to achieve. There is no clarity in the purpose of bringing the foreign administration's orbital resource under the Indian administration. We, therefore, recommend that this policy guideline of transferring the non-Indian orbit resources under Indian administration should be removed.

(i) For Indian Entity using non-Indian orbit resources, the only technical conditions to be applied should be around coordination with the Indian Administration. If coordination under the ITU regime is obtained, and the applicant is duly authorised by the country of its origin, then such non-Indian orbit resources should be authorized in India, as long as it is managed by an Indian Entity. In case of a leased space asset, the operator of such asset shall endorse the evidences presented by the applicant referred herein.

(ii) We would like to highlight here that the orbital resources are considered global assets and is governed by ITU. To the best of our knowledge, there are no established global practice of requiring a change in administration of the orbital resources and hence this may not be possible to implement easily. This clause further complicates rather than enabling “ease of doing business” in India as per the vision of Government of India.

18. **Para 6.7.10.** The authorisation shall be applicable to a specific Indian Entity and any change of ownership requires a fresh authorisation.

Comments/ View

It is submitted that change of ownership should not result in requirement of a new authorization in an ideal case. However, if still necessary than extent of change of ownership that requires fresh authorization may need to be defined. This would include clarity on change of part ownership (such as increase/decrease of shareholding) which would not require a fresh authorization.

19. **Para 6.7.12.** The proposals of building space systems in India or launching from India or manufacturing ground/user segment in India, thus creating opportunities for growth of satcom industry, employment generation and bringing FDI into the country may be encouraged while according authorisations.

Comments/ View

The proposals of building space systems in India or launching from India or manufacturing ground/user segment in India, thus creating opportunities for growth of satcom industry, employment generation bringing new technologies, and bringing FDI into the country ~~may~~ will be encouraged while according authorisations. Towards this technical collaborations and any other special purpose vehicles with foreign entities wherever required and the quantum of made in India component will be given due weightage and bringing FDI into the country may be encouraged while according authorisations.

20. **Para 6.7.13.** IN-SPACe shall demand, as and when necessary, the disclosure of additional information contained in any form, from an entity involved in space based communication activities and services, which directly or indirectly relates to the conduct of space based communication activities and services.

Comments/ View

In case of receipt of suitable commercial proposals for space segment (satellite / Launch vehicle) or ground segment from reputed high profile foreign space vendor, JV with well-established and recognized Indian Company in the Space Industry preferably having net worth more than 100 Crore Rupees shall be given preference for Authorization.

21. **Para 6.8. Other permissions/clearances for use of space asset for communications**

Comments/ View

(a) This will be coordinated by IN-SPACe.

(b) It is important to have a mechanism in place for a single window application & clearance to reduce the complexity & time taken in obtaining of multiple clearances from several agencies.

22. **Para 6.8.1.** Utilisation of authorised space assets for broadcast services in India shall require the approval/license/clearance of Ministry of Information and Broadcasting (MoIB) as per stipulated regulations and guidelines.

Comments/ View

INSPACe should establish a “Authorised Space Station List” and this should be well published. Any service provider who is licensed by either MIB or DoT should be able to pick up any space station asset/resource from the list and lease capacity without requiring any additional authorisation from INSPACe. They will only follow the procedures/norms laid down by MIB or DoT.

23. **Para 6.8.2.** Utilisation of authorised space assets for interactive services in India shall require the approval/license/clearance of Department of Telecommunications (DoT), Ministry of Communications as per stipulated regulations and guidelines.

Comments/ View

(a) As clause 6.5 permits foreign owned space assets realised in India, we recommend that the clause 6.8.2 could be amended as given below: -

(b) **Recommended revised clause** - “Utilisation of authorised space assets or **foreign space assets offering coverage over India** for interactive services in India shall require the approval/license/clearance of Department of Telecommunications (DoT), Ministry of Communications as per stipulated regulations and guidelines”.

24. **Para 6.8.4.** Use of Indian space assets for services outside India shall require approval/license/clearance of regulatory authorities of respective countries as the case may be.

Comments/ View

Or if the same is used in Internal Airspace and International waters, then whatever rights are available with the state should be suitably granted to the service providers operating from Indian soil. This is consistent with DoT’s policy on Flight and Maritime Connectivity rules 2018.

25. **Para 7.1.** India has realised end-to-end indigenous capabilities in building, launching and operating communication satellites over the past years. The indigenous assets achieved due to the fructifications of the long-time investments and efforts by the Government of India needs continued utilization.

Comments/ View

In order to incentivise the Indian industry, any strategic use of satellite communications should be open to only operators/service providers who are using space assets that are built by Indian companies by indigenous efforts.

26. **Para 7.2.** In order to ensure the continued utilisation of currently operational space assets, their operations and management shall be carried out by business establishment of identified PSU/CPSE.

Comments/ View

Private Sector Industries are still not provided the same level playing ground in the sense that only PSU / CPSEs are mentioned but NOT Private Sector Industries. Example, Article 7.2, 8.7, 9.3. This anomaly may please be rectified by including “Private Industries” also.

27. **Para 7.3.** Replacements of operational satellites shall be ensured for continued use of the orbital resources.

Comments/ View

Such replacement satellites shall be procured through Indian Private Entities.

28. **Para 8.** Protection and enhancement of orbital resources

Comments/ View

Will be coordinated by IN-SPACe.

29. **Para 8.4.** While identifying spectrum for new services at National and/or ITU level, coordinated efforts shall be made by the Concerned Ministries for ensuring the operational continuity of space assets.

Comments/ View

Consistent with international best practices, such use of orbital resources should be combined with spectrum authorization by Indian entities.

30. **Para 8.6.** IN-SPACe shall prescribe the methodology for allocation of identified Indian Orbital resources to Indian Entities.

Comments/ View

Clarity is required on how priority would be accorded on allocation. Would this be based on ITU filings?

31. **Para 8.7.** DOS shall monitor and ensure continued occupancy and utilization of the orbital resources including the timely deployment of satellites by its PSU/CPSE and Indian entities. In cases where any authorised Indian Entity is found unable to bring replacement space system in an operational orbital slot or unable to take suitable actions to protect the acquired orbital resource within its validity period, DOS shall take appropriate action for protection of such resource including assigning the same to other Indian Entities following stipulated procedures.

Comments/ View

Private Sector Industries are still not provided the same level playing ground in the sense that only PSU / CPSEs are mentioned but NOT Private Sector Industries. Example, Article 7.2, 8.7, 9.3. This anomaly may please be rectified by including “Private Industries” also.

32. **Para 9.** Strengthening research & development and addressing strategic & societal communications requirements

Comments/ View

This should be restricted to strategic applications and should not include societal applications. Any societal application is yet another commercial application that may or may not be funded by the Government. NGSO satellites prove to be a very viable alternative and very cost effective in providing communications to such applications. Such a restriction will only hurt such societal applications. This can be reviewed at a later time when the Indian industry has developed enough capabilities to build a NGSO system of their own.

33. **Para 91.** While the effort is to provide a conducive and enabling environment for the industry to meet the requirements of space based communications for various broadcasting, telecommunications and networking activities in the country, there would still be communications requirement pertaining to applications in the domains of national security, strategic communications and surveillance that may require channels protected with appropriate hardware and software solutions. For these communications, in view of sensitivities involved, the systems need to be developed with indigenous designs and systems under the supervision of Government.

Comments/ View

GO-CO Model would need to be facilitated.

34. **Para 9.3.** Satellite communication programmes focused on societal development have been implemented in the areas of tribal development, social empowerment, health, education, disaster management, etc. Any such communication requirements, which address the societal need shall be pursued by DOS. Such systems may be realised by DOS/ISRO with the involvement of stakeholder ministry(ies)/state governments /governmental agencies.

Comments/ View

(a) Need to be eventually allowed for Private Enterprise on a case to case basis.

(b) Private Sector Industries are still not provided the same level playing ground in the sense that only PSU / CPSEs are mentioned but NOT Private Sector Industries. Example, Article 7.2, 8.7, 9.3. This anomaly may please be rectified by including “Private Industries” also.

35. Para 10. Provision of timely and responsive regulatory environment**Comments/ View**

Although grant of timely approvals is mentioned, no specific timeline is stipulated. It is requested to have a time-bound authorisation process in the policy. The Government in various areas have built a very successful online/web based portal mechanism for filing and tracking of applications with a great emphasis on transparency. The same approach should be adopted here.

36. **Para 10.5.** DOS shall be the nodal department in respect of space activities as per the Government of India allocation of business rules and shall bring out policy guidelines and additional regulations in respect of space based communications and shall fulfil the obligations as signatory to UN registration convention.

Comments/ View

IN-SPACe board shall within the ambit of Space Policy, have authorization to interpret & Clear cases that donot strictly fall within the definitions listed herein in this policy.

36. DOS being the nodal department shall be responsible for implementation of the Spacecom Policy-2021.

Comments/ View

The Government in various areas have built a very successful online/web based portal mechanism for filing and tracking of applications with a great emphasis on transparency. The same approach should be adopted in granting such authorisations as well.

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Additional Suggestions for Consideration**INSPACe Structure & Functioning**

1. The Governing body of In-Space should be autonomous similar to TRAI and have good representation from Industry (entrepreneur) User agencies both Government and private as well as academicians for advise on right technology, Insurance agencies, banking industries in other words, all stakeholders should have representation in the single window nodal agency. There can be sub committees, which will address specific areas/interests of all cross sections of the stakeholders.

Transparency of Processes

2. The rules and procedures for processing of applications, is to be made public, accountability for time to process and reasons for rejection can be in public domain. The appellate body and types of disputes also to be published in the prospectus of the IN-SPACE portal. Offer to take complaints and disputes to TDSAT as an interim measure until a statutory body is made provides some relief.