

Telecommunications authorisation regime, 2026: Key features of the new authorisation based framework

The Department of Telecommunications (“DoT”), on June 23, 2026, notified the Telecommunications (Authorisation for Provision of Principal Telecommunication Services) Rules, 2026, the Telecommunications (Authorisation for Provision of Miscellaneous Telecommunication Services) Rules, 2026, the Telecommunications (Authorisation for Captive Telecommunication Services) Rules, 2026, and the Telecommunications (Terms and Conditions for Migration) Rules, 2026. These rules establish the legal and regulatory architecture for provision of telecommunications services under the new authorisation based regime and prescribe the eligibility conditions, application procedures, financial requirements, operational obligations, security safeguards and migration framework applicable to authorised entities. The update also examines the key implications of the transition from the erstwhile licensing regime, the launch of the DoT’s digital authorisation and migration portal, and the impact of the new framework on telecom operators, satellite service providers, captive network operators, virtual network operators and other stakeholders across the telecommunications ecosystem.

For a detailed analysis, please refer to the [JSA Prism of June 2026](#).

Draft Telecom Consumers Protection (Thirteenth Amendment) Regulations, 2026

The Telecom Regulatory Authority of India (“TRAI”), on April 7, 2026, released the Draft Telecom Consumers Protection (Thirteenth Amendment) Regulations, 2026. It proposes targeted regulatory intervention to address gaps in the availability, pricing, and disclosure of voice and short message service only Special Tariff Vouchers (“STVs”). TRAI aims to prevent indirect discrimination against non-data users. It proposes to achieve this by mandating parity in validity periods between bundled and non-data STVs, requiring largely proportional tariff reductions, and strengthening publication and transparency obligations. The proposed amendment reinforces TRAI’s broader consumer-protection objectives to ensure fair, affordable, and meaningful consumer choice particularly for low income and rural subscribers while signalling closer regulatory scrutiny of tariff structures going forward.

For a detailed analysis, please refer to the [JSA Prism of April 20, 2026](#).

Use of On Board Unit for Cellular Vehicle-to-Everything communication in the 5.9 GHz Band (Exemption from Licensing Requirements) Rules, 2026

The DoT, on June 10, 2026, notified the Use of On Board Unit for Cellular Vehicle-to-Everything (“CV2X”) Communication in the 5.9 GHz band (Exemption from Licensing Requirements) Rules, 2026 (“CV2X

Exemption Rules”). It seeks to enable the use of On Board Units (“**OBU**s”) for C-V2X communication in the 5875-5905 MHz frequency band without requiring a licence, subject to prescribed technical and operational safeguards.

The key provisions introduced are as follows:

Overview and scope

1. The C-V2X Exemption Rules apply to the 5875-5905 MHz frequency band and define key terms including ‘equivalent isotropic radiated power’, ‘interference’, ‘international standards’, ‘maximum power spectral density’, ‘On Board Unit’, ‘portal’ and ‘power spectral density’.
2. The term ‘on board unit’ is defined to mean radio equipment, including its antenna, operated as part of an intelligent transport system established for road transport, where such equipment is installed on a vehicle, forms part of a vehicle, or is held or carried by an individual in relation to a vehicle.

Licensing exemption and application process

1. The C-V2X Exemption Rules permit the establishment, maintenance or working of the OBUs for the sole purpose of C-V2X communication in the 5875-5905 MHz band, without assignment of radio frequency, on a non-interference, non-protection and non-exclusive basis.
2. The C-V2X Exemption Rules exempt any person from obtaining a licence for possession of such OBUs, and exempt dealers from obtaining a licence for their sale or hire.
3. The C-V2X Exemption Rules require permission and exemption to be sought for each equipment type of on board unit by making an application on the prescribed portal in the form set out in the Schedule, unless approval for the relevant equipment type has already been granted and published on the portal.

Standards and schedule

1. The C-V2X Exemption Rules require OBUs to conform to standards notified by the Bureau of Indian Standards (“**BIS**”) or the Central Government, and where no such standards have been published, to conform to relevant international standards.
2. The Schedule to the C-V2X Exemption Rules prescribes a detailed form for equipment type approval, requiring applicant details, transmitter specifications, receiver specifications and other technical particulars, with a separate application required for each equipment type.

Use of Short Range Automotive Radar System in the 77 81 GHz Band (Exemption from Licensing Requirements) Rules, 2026

The DoT, on June 11, 2026, notified the Use of Short-Range Automotive Radar System in the 77-81 GHz Band (Exemption from Licensing Requirements) Rules, 2026 (“**Automotive Radar Exemption Rules**”). It provides for a licensing exemption framework for short-range automotive radar systems operating in the 77-81 GHz frequency band, subject to prescribed technical, procedural and interference management conditions.

The key provisions introduced are as follows:

Overview and scope

1. The Automotive Radar Exemption Rules apply to the 77-81 GHz frequency band and define key terms including ‘equivalent isotropic radiated power’, ‘interference’, ‘international standards’, ‘portal’, ‘Short-Range Automotive Radar System’ and ‘vehicles’.

2. The term ‘Short-Range Automotive Radar System’ is defined to mean radio equipment operating in the 77-81 GHz frequency band installed on a vehicle for radiolocation purposes, while the term ‘vehicles’ is defined broadly to include passenger cars, buses, trucks, aircraft while taxiing, railroad train locomotives, train cars, monorails, trams, construction vehicles, motorcycles, scooters and boats or ships operated within India’s territorial waters.

Licensing exemption and application process

1. The Automotive Radar Exemption Rules permit the establishment, maintenance or working of a short-range automotive radar system installed on a vehicle and operating in the 77-81 GHz frequency band without assignment of radio frequency, on a non-interference, non-protection and non-exclusive basis.
2. The Automotive Radar Exemption Rules exempt any person from obtaining a licence for possession of such Short-Range Automotive Radar Systems, and exempt dealers from obtaining a licence for their sale or hire.
3. The Automotive Radar Exemption Rules require permission and exemption to be sought for each equipment type of Short-Range Automotive Radar System by filing an application on the prescribed portal in the form set out in the Schedule, unless approval for a similar equipment type has already been granted and published on the portal.

Standards, interference management and schedule

1. The Automotive Radar Exemption Rules require Short-Range Automotive Radar Systems to conform to standards notified by BIS or the Central Government, and where no such standards have been published, to conform to relevant international standards.
2. The Automotive Radar Exemption Rules provide a mechanism for addressing harmful interference, empowering the Central Government or an authorised officer to require users of exempted radio equipment to take mitigation measures such as relocation of equipment, reduction in power and use of specified types of antennae.
3. The Schedule to the Automotive Radar Exemption Rules sets out the application form for equipment type approval, requiring details of the applicant, transmitter, receiver and other technical particulars, and clarifies that a separate application must be submitted for each type of equipment.

TRAI releases Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulation, 2026

The TRAI, On May 7, 2026, released the Draft Telecom Consumers Complaint Redressal (Fourth Amendment) Regulations, 2026 (“**TCCRR Amendment**”), inviting stakeholder comments by June 5, 2026. The TCCRR Amendment seeks to comprehensively update and strengthen the consumer grievance redressal framework under the Telecom Consumers Complaint Redressal Regulations, 2012 (“**TCCRR 2012**”), in light of the enactment of the Telecommunication Act, 2023 (“**Telecom Act**”), evolving service delivery models, and increasing usage of digital interfaces for consumer engagement.

The key amendments proposed in the TCCRR Amendment are as follows:

Overview and scope

1. Regulation 1 of the TCCRR Amendment revises the scope and applicability of the regulations to align with the authorisation-based framework under the Telecom Act. References to licence are supplemented with authorisation, and TCCRR 2012 now explicitly applies to service providers holding appropriate authorisations for access and internet services.
2. Regulation 2 of the TCCRR Amendment updates and introduces several definitions to reflect technological and regulatory developments. New definitions for Broadband Service, Complaint Monitoring System, Grievance Redressal Mechanism, Service Query, and Survey are incorporated, while obsolete or duplicative definitions are removed. The definition of Service Provider is updated to refer to both licence and authorisation holders.

Complaint centre operations and grievance channels

1. Regulation 3 of the TCCRR Amendment extends complaint centre operating hours to round the clock availability, recognising the continuous nature of telecom and broadband services. The regulation also introduces detailed and standardised requirements for Interactive Voice Response System (“**IVRS**”) flows including clear categorisation of complaints, appeals, and service queries, availability of human assistance, and call-back options to ensure uniform consumer experience across service providers.
2. Regulations 3(10) and 3(11) of the TCCRR Amendment expands grievance-redressal channels by enabling complaint and appeal registration not only through call centres but also through web portals and mobile applications, with structured menus, free-text and voice-note input, real time status tracking, and regular updates. The TCCRR Amendment also recognises the optional use of new age tools such as chatbots and artificial intelligence-based agents, while retaining human-assisted support as a core component.
3. Regulation 3(12) of the TCCRR Amendment introduces specific provisions to improve accessibility for persons with disabilities. These include dedicated support desks at call centres, trained personnel to assist via assistive technologies, and mandatory accessibility features for mobile applications and websites, in line with Government of India guidelines.

Appellate process and consumer feedback

1. Regulation 9 of the TCCRR Amendment reduces the time limit for consumers to file an appeal following unsatisfactory complaint redressal from 30 (thirty) days to 15 (fifteen) days, expediting the dispute-resolution process. Regulations 10, 11, and 13 restructure the appellate process by removing the Advisory Committee, citing procedural delays and diffusion of accountability, and strengthening the Appellate Authority as the sole decision making body.
2. Regulation 14.A of the TCCRR Amendment introduces a new requirement for administering an online consumer satisfaction survey upon closure of each complaint or appeal.

Reporting audits and enforcement

1. Regulation 15 of the TCCRR Amendment enhances reporting obligations by mandating detailed quarterly performance reports for complaints and appeals at the Licensed Service Area level, including defined Key Performance Indicators and survey based metrics. Regulation 5(4) of the TCCRR Amendment further requires service providers to establish a prominently displayed ‘Consumer Corner’ on their websites, containing grievance related disclosures and performance data.
2. Regulation 18 of the TCCRR Amendment introduces a structured framework for regulatory reviews, audits, inspections, and financial disincentives. The TRAI may conduct periodic audits and examinations of grievance redressal systems, supported by the requirement for service providers to retain complaint and appeal data for at least 1 (one) year. The amendment proposes financial disincentives for improper dismissal or unsatisfactory disposal of complaints and appeals, delays in submission of quarterly reports, and failure to pay imposed disincentives within prescribed timelines, including interest liability and quarterly caps on financial exposure.

TRAI releases Rating of Properties for Digital Connectivity (Amendment) Regulations, 2026

The TRAI, on May 13, 2026, released the Rating of Properties for Digital Connectivity (Amendment) Regulations, 2026 (“**Digital Connectivity Rating Amendment**”), amending the Rating of Properties for Digital Connectivity Regulations, 2024 (“**Principal Regulations**”) to refine the framework for assessing and rating digital connectivity in properties. The key amendments introduced are as follows:

Overview and scope

1. The Digital Connectivity Rating Amendment revises the scope and applicability of the Principal Regulations to explicitly cover additional stakeholders, including In-Building Solution Providers (“**IBS Providers**”), alongside property managers, Digital Connectivity Rating Agencies (“**DCRAs**”) and service providers and introduces definitions for ‘In-Building Solution’ and ‘In-Building Solution Provider’, and the definition of ‘Service Provider’ is amended to cover both authorisation holders under the Telecom Act and licensees under the Telegraph Act, 1885 (“**Telegraph Act**”).
2. Regulation 3 of the Digital Connectivity Rating Amendment revises the classification framework for properties to better align categories with usage patterns and infrastructure requirements.

Fees and evaluation process

1. Regulation 9 of the Digital Connectivity Rating Amendment strengthens transparency in fee determination by requiring DCRAs to disclose fees and terms upfront and offer suitably structured and transparent fee arrangements, including for optional digital connectivity audit services. Regulation 13 of the Digital Connectivity Rating Amendment clarifies that fees for both rating and optional digital connectivity audit must be mutually agreed between the DCRA and the property manager, in accordance with the transparency requirements under Regulation 9 of the Digital Connectivity Rating Amendment.
2. Regulation 10 of the Digital Connectivity Rating Amendment significantly restructures the evaluation process, particularly for properties under construction. It introduces a phased assessment mechanism including: (a) design-stage evaluation with issuance of a ‘Designed For’ certificate, (b) post-construction assessment with an ‘Installation Completed For’ certificate; and (c) final rating only after digital connectivity services become operational.
3. Regulation 14 of the Digital Connectivity Rating Amendment expands the application framework to explicitly enable property managers of completed properties to opt for standalone digital connectivity audits without seeking a rating and requires submission of approved design documentation for properties under construction applying for rating.

Competition safeguards and technical standards

1. Regulation 20 and Regulation 23 of the Digital Connectivity Rating Amendment introduce and reinforce prohibitions on exclusive arrangements between stakeholders. The property managers, IBS Providers, and service providers are restricted from entering into exclusive access or service arrangements, thereby promoting non-discriminatory access and competition among multiple telecom service providers within properties.
2. Regulations 24 and 25 of the Digital Connectivity Rating Amendment introduce technical refinements in assessment criteria, including enabling both fibre and wireless backhaul connectivity and updating references from the National Building Code to the National Building Construction Standards, 2026, ensuring alignment with the latest construction standards.

Rating framework and fee governance

1. Regulation 26 of the Digital Connectivity Rating Amendment revises the scoring and star rating framework to allow finer differentiation between properties, including expanded score bands corresponding to higher granularity in rating levels.
2. Under the Schedule I of the Digital Connectivity Rating Amendment, DCRAs are mandated to define transparent fee structures, declare maximum chargeable fees, and ensure impartiality by avoiding any direct or indirect commercial engagements that could influence rating outcomes.

Draft Telecommunications (Television, Radio and Associated Services) Rules, 2026

The Ministry of Information and Broadcasting (“MIB”), on June 12, 2026, released the Draft Telecommunications (Television, Radio and Associated Services) Rules, 2026 (“**Draft Broadcasting Rules**”). under the Telecom Act, seeking to unify the fragmented licensing frameworks for satellite television, Direct-to-Home (“DTH”), FM radio, community radio, Internet Protocol Television (“IPTV”) and associated services into a single authorisation-based rule book. Comments may be submitted by July 27, 2026. The key provisions proposed are as follows:

Overview and scope

1. The Draft Broadcasting Rules consolidate multiple existing policy and licensing frameworks, including the uplinking and downlinking guidelines for satellite television channels, DTH guidelines, Headend-in-the-Sky (“HITS”) guidelines, FM radio Phase III guidelines, community radio guidelines and IPTV guidelines, into a unified rule book under the Telecom Act.
2. Chapter 2 of the Draft Broadcasting Rules prescribes the categories of authorisations, namely television channel, television channel distribution service, teleport, news agency for television, private radio service and community radio service, and sets out eligibility conditions for each category, including entity form, foreign investment compliance, net worth requirements and security conditions.
3. The Draft Broadcasting Rules classify television channels into news channels and non-news channels, which may be broadcast through satellite or terrestrial transmission medium, and require applicants to be companies or Limited Liability Partnerships (“LLPs”), satisfy minimum net worth requirements and hold appropriate rights in respect of the name and logo of the proposed television channel.
4. The Draft Broadcasting Rules recognise television channel distribution services comprising of the DTH services and HITS services. It prescribes cross holding restrictions between television channel operators, DTH operators, HITS operators and multi-system operators to address concentration and ownership concerns in the broadcasting distribution ecosystem.

Application procedure and validity

1. Chapter 3 of the Draft Broadcasting Rules sets out the procedure for application and grant of authorisation, including submission of application and fees, furnishing of applicant details and key managerial personnel information for security clearance, issuance of a letter of intent, payment of entry fee, authorisation fee, performance bank guarantee and security deposit, and grant of authorisation through a designated portal.
2. The Draft Broadcasting Rules prescribe validity periods of 10 (ten) years for television channels, teleports, news agencies for television and community radio services, 20 (twenty) years for television channel distribution services and 15 (fifteen) years for private radio services, while also setting out renewal conditions, including compliance history, security clearances and adherence to programme and advertising codes.
3. The Draft Broadcasting Rules introduce a migration framework under which existing licence, registration or permission holders under the Telegraph Act or Wireless Telegraphy Act, 1933 may migrate to corresponding authorisations under the new framework, subject to payment of pending dues and compliance with the application process.

Operational obligations and spectrum

1. Chapter 4 of the Draft Broadcasting Rules prescribes general obligations of authorised entities, including compliance with applicable laws, the programme code and advertising code, maintenance of security clearances, non-assignment of authorisation, reporting of ownership and shareholding changes, preservation of programme recordings for ninety days and cooperation with monitoring and inspection by the Central Government.

2. The Draft Broadcasting Rules clarify that grant of authorisation does not confer any right to assignment and use of spectrum and require authorised entities intending to use spectrum to apply for assignment under the Telecom Act unless exempted from such requirement.
3. The Draft Broadcasting Rules regulate the use of digital satellite news gathering (“**DSNG**”) equipment by specified authorised entities, including news channels, teleports and news agencies for television, and prescribe permissible use cases, record-keeping requirements, encryption requirements, registration requirements and performance bank guarantee obligations.

Transfer, adjudication and fees

1. Chapter 6 of the Draft Broadcasting Rules permits transfer of television channel, teleport and private radio service authorisations only after expiry of the applicable lock-in period and with prior approval of the Central Government, while prohibiting transfer of authorisations for television channel distribution services, news agencies for television and community radio services.
2. Chapter 7 of the Draft Broadcasting Rules establishes an adjudication and appeals framework for breach of terms and conditions of authorisation, including appointment of Adjudicating Officers, constitution of Designated Appeals Committees, inquiry procedure, voluntary undertakings, appeal timelines, publication of orders and recovery of dues as arrears of land revenue.
3. The Schedules to the Draft Broadcasting Rules specify exempt entities, minimum net worth requirements and applicable fees, including application processing fees, entry fees, annual authorisation fees, performance bank guarantees, security deposits, registration fees for platform services and processing fees for DSNG.

Draft Telecommunications (Administrative Process Spectrum Assignment) Rules, 2026

On June 17, 2026, DoT published the draft Telecommunications (Administrative Process Spectrum Assignment) Rules, 2026 (“**Draft Spectrum Assignment Rules**”) under the Telecom Act, prescribing eligibility criteria, application processes, spectrum charges, compliance obligations and enforcement mechanisms for administrative spectrum assignments. Comments may be submitted by July 18, 2026.

The key provisions proposed are as follows:

Overview and scope

1. The Draft Spectrum Assignment Rules govern spectrum assignment through the administrative process for entries listed in the First Schedule to the Telecom Act, and define key terms including ‘letter of intent’, ‘portal’, ‘spectrum assignment’ and ‘spectrum charges’.
2. The framework clarifies that Schedule I identifies eligible applicants and permitted uses, while Schedule II sets out the applicable charging annexures and methodologies for determination of spectrum charges.

Eligibility framework

1. The Draft Spectrum Assignment Rules prescribe eligibility conditions for applicants seeking administrative spectrum assignment, including compliance with the criteria specified under the relevant entry of Schedule I.
2. In the case of companies, applicants are required to comply with applicable foreign direct investment requirements, and key managerial personnel must satisfy security-related criteria, as may be specified by the Central Government on the portal.

Application and grant of spectrum assignment

1. The Draft Spectrum Assignment Rules establish a structured application process requiring submission of an application in the prescribed form and manner, along with a non-refundable application fee of INR 1,000 (Indian Rupees one thousand) and detailed information relating to the intended spectrum use, authorisation or licence held, geographical area of operation, radio equipment, technical parameters, proposed duration and applicable statutory permissions.
2. Where radio equipment is proposed to be installed at a fixed site, prior site clearance is required in the manner specified on the portal, subject to limited exceptions for specified First Schedule entries where such clearance may be obtained after grant of spectrum assignment.
3. Spectrum assignment may be granted following examination of the application, subject to spectrum availability and relevant site and security clearances, with the Central Government issuing a letter of intent prior to final assignment.

Obligations and modification of assignments

1. The Draft Spectrum Assignment Rules impose general obligations on spectrum assignees, including maintaining an updated inventory of permitted radio equipment, ensuring secure custody and authorised operation, using spectrum strictly for the approved purpose, preventing interference with other authorised networks, complying with notified standards and security directions, and restricting assignment or transfer of spectrum without prior Central Government approval.
2. The Rules also provide a mechanism for modification or variation of spectrum assignments, including changes to radio station details, frequency or other technical parameters, subject to application, payment of a non-refundable fee of INR 1,000 (Indian Rupees one thousand), spectrum availability, relevant security clearances and payment of applicable spectrum charges.

Renewal, surrender and equipment disposal

1. The Draft Spectrum Assignment Rules provide for renewal of spectrum assignments, requiring eligible assignees to apply at least 1 (one) month prior to expiry, with delayed applications permitted on sufficient cause and payment of late fees.
2. The rules permit voluntary surrender of spectrum assignment upon submission of an application at least 30 (thirty) days prior to the proposed surrender date, along with proof of payment of applicable spectrum charges and other dues.
3. Upon expiry, surrender or revocation of spectrum assignment, assignees are required to dispose of radio equipment within prescribed timelines and submit proof of such disposal in the manner specified by the Central Government.

Government powers, enforcement and digital implementation

1. The Draft Spectrum Assignment Rules empower the Central Government to impose restrictions on spectrum use in sensitive or restricted areas, including areas proximate to India's international borders, the Line of Control and the Line of Actual Control, and to issue orders, directions or guidelines for implementation of the framework.
2. Breach of the terms and conditions of spectrum assignment is treated as a breach under Section 32 of the Telecom Act, enabling suspension, revocation or curtailment of spectrum assignment after due process.
3. The rules also enable digital implementation by permitting the Central Government to notify one or more portals for publication of forms, procedures, orders, directions and guidelines.

Schedules and spectrum charges

1. Schedule I identifies eligible persons, permitted uses and applicable charging annexures for various categories of administrative spectrum assignment, including national security and defence, law enforcement, public broadcasting, disaster management, scientific research, transport safety and operations, conservation of natural resources and wildlife, meteorology, mining and port operations, public mobile radio trunking services, radio backhaul, community radio, in-flight and maritime connectivity, space research, BSNL/MTNL operations, and testing or trials of new technologies.
2. Schedule II sets out detailed spectrum charge methodologies and service-specific fee structures through annexures, covering terrestrial broadcasting, land mobile, maritime mobile, aeronautical, radionavigation and radiolocation, multiplexed fixed and mobile services, satellite-based services, public mobile radio trunking services, commercial satellite communication services, radio backhaul, access spectrum, testing and trials, and delayed payment of spectrum charges.
3. The Draft Spectrum Assignment Rules prescribe service-specific fee methodologies, including annual spectrum fees, radio station or equipment charges, bandwidth-linked satellite spectrum charges, Adjusted Gross Revenue (“AGR”) linked charges for specified commercial satellite and radio backhaul services, market-value based charges for access spectrum, and delayed payment charges linked to the State Bank of India marginal cost of funds based lending rate plus 2%, subject to minimum charges and treatment of part months as full months.

Consultation Paper on Formulation of a Regulatory Framework for ALTD Services, including Free Ad-Supported Streaming Television (FAST) services

The TRAI, on April 6, 2026, issued a Consultation Paper on the Formulation of a Regulatory Framework for Application-based Linear Television Distribution (“ALTD”) Services, including Free Ad-Supported Streaming Television (“FAST”) services (“ALTD Consultation Paper”), inviting stakeholder comments on authorisation, consumer protection and pricing frameworks for this rapidly growing segment. The key issues under the ALTD Consultation Paper were as follows:

Overview and scope

1. A central issue raised for consultation relates to the definition and scope of ALTD services under the Indian broadcasting regulatory framework. TRAI asked stakeholders how ALTD services, which provide scheduled linear television channels through applications on smart televisions, mobile devices, web platforms, or preinstalled systems, should be conceptualised and defined. TRAI invited comments on whether ALTD services should be treated as a distinct category of linear television distribution, drawing reference from international definitions of FAST services adopted in other jurisdictions.
2. Another key issue concerns the identification of the primary stakeholder responsible for provisioning ALTD services. The ALTD Consultation Paper highlights that the ALTD ecosystem typically involves multiple entities, including application providers, television manufacturers, operating system providers, content aggregators, and broadcasters.

Authorisation framework and common obligations

1. The consultation also addresses the need for a formal authorisation framework for entities provisioning ALTD services. TRAI invites comments on the applicability of the authorisation regime recommended under its Framework for Service Authorisations for Provision of Broadcasting Services under the Telecom Act, and whether a separate authorisation category should be introduced for ALTD services within the broader class of television channel distribution services.
2. TRAI has proposed examining whether the common obligations applicable to traditional distribution platform operators such as monitoring, inspection, reporting, security conditions, infrastructure sharing, and compliance

with programme and advertising codes could be adapted, with suitable contextual modifications, to ALTD services. TRAI also seeks views on whether obligations currently applicable to DTH, HITS, and IPTV services, including compulsory carriage of certain channels and mandatory sharing of sports broadcasting signals, should apply to ALTD services.

Authorisation of content, consumer protection and audience measurement

1. The ALTD Consultation Paper further raises concerns regarding the nature of television channels made available on ALTD platforms, particularly the distinction between channels duly authorised by MIB and those operating without any permissions. TRAI sought stakeholder inputs on whether broadcasters or content owners providing channels on ALTD platforms should obtain appropriate authorisations for satellite-based broadcasting, ground-based broadcasting, or both, before entering into distribution arrangements with ALTD service providers.
2. TRAI has noted the stakeholder concerns that pay channels, which are monetised on traditional distribution platforms, are being retransmitted free on ALTD and FAST platforms, potentially distorting tariff parity and the existing pricing framework under the Telecommunication (Broadcasting and Cable) Services Tariff Order, 2017. TRAI invites comments on the appropriate pricing methodology to ensure uniformity and fairness across platforms distributing linear television content.
3. The ALTD Consultation Paper also sought stakeholder views on consumer protection and grievance redressal mechanisms in the context of ALTD services. TRAI highlights the absence of clarity for consumers regarding responsibility for service-related or content-related grievances on ALTD platforms and has invited comments on the nature of obligations that may be specified for authorised ALTD service providers to ensure effective consumer protection across different access modes, including smart televisions, mobile applications, and web platforms.
4. Another area of consultation relates to audience measurement and viewership data for ALTD services. In view of the revised Television Ratings Policy, 2026, which seeks technology-neutral audience measurement across multiple viewing platforms, TRAI invites stakeholder views on the appropriate methodology for integrating ALTD viewership data into the television ratings ecosystem.

Future regulatory considerations

The ALTD Consultation Paper raises future-looking considerations, including the possibility of ALTD services evolving from purely free, ad-supported models to hybrid or subscription-based offerings. In this regard, TRAI invites comments on how such services could be regulated in future, particularly with respect to tariff regulation, interconnection arrangements, and quality of service requirements. TRAI also encourages stakeholders to identify any additional issues such as channel positioning, electronic programme guides, revenue-sharing arrangements, or international best practices that may merit consideration while formulating the regulatory framework for ALTD services.

TRAI consultation paper on the Satellite Communication Network Authorisation and Spectrum Assignment

The TRAI, on April 8, 2026, released a consultation paper on the Framework for Satellite Communication Network (“SCN”) Authorisation and Assignment of Spectrum to Satellite Communication Network Providers (“**SCN Consultation Paper**”), addressing key questions around eligibility, operational obligations, interconnection and spectrum governance. Stakeholder comments were invited by May 6, 2026.

The consultation broadly covered the following:

Overview and scope

1. The eligibility criteria, service area, validity period and overall functional scope of the proposed SCN authorisation including assessment of how the SCN authorisation would co-exist with or supersede existing frameworks such as the Satellite Earth Station Gateway authorisation, and how the separation between network and service layers should be structured to ensure clarity, efficiency and regulatory consistency.
2. The operational obligations that must apply to SCN entities, covering the localisation of satellite gateways within India, the mandatory routing of all domestic user traffic through Indian gateways, measures for interference mitigation, and the establishment of real-time monitoring facilities.

SCN-as-a-service, service providers and interconnection

The SCN Consultation Paper seeks stakeholder input on several key issues:

1. which categories of service providers should be allowed to utilise SCN-as-a-service (“**SCNaaS**”) from SCN authorised entities, including whether Virtual Network Operators (“**VNOs**”) should be eligible. This assessment requires consideration of the broader service delivery ecosystem and the extent to which extending SCNaaS to VNOs might enable additional use cases, promote competition, or create regulatory asymmetries;
2. whether SCN authorised entities that install and operate baseband systems should be required to extend control, visibility and resource-management capabilities to the service authorised entities they support;
3. whether additional provisions relating to ground-station authorisations, space-segment permissions and coordination requirements need to be incorporated into the terms and conditions governing SCN authorisation given the applicability of the Indian Space Policy-2023 and the IN-SPACE Norms, Guidelines and Procedures; and
4. whether there is a need for regulator-mandated reference agreements between SCN entities and service providers, or whether such arrangements should continue to be commercially negotiated. Additionally, it raises questions regarding the interconnection framework for satellite-based networks with existing public land mobile network and public switched telephone network networks, taking into account ongoing deliberations under the broader interconnection review.

Permissible services and spectrum allocation

1. The range of services that may be provisioned using SCNs, including Fixed-Satellite Service (“**FSS**”), Mobile-Satellite Service (“**MSS**”), Direct-to-Device (“**D2D**”) using MSS spectrum, and D2D using IMT spectrum. The SCN Consultation Paper additionally seeks stakeholder input on whether India should permit D2D using IMT spectrum immediately or await the outcomes of WRC-27, noting the evolving global regulatory environment and technical considerations.
2. Which combinations should be allowed and whether SCN entities should be eligible for assignment of FSS and MSS spectrum. TRAI also seeks inputs on whether the spectrum assignment framework recommended by TRAI should apply to SCN entities with modifications.
3. Where SCN entities utilise spectrum that has been administratively assigned to service authorised entities, the SCN Consultation Paper highlights the need to determine whether a specific policy framework should govern such arrangements. This requires consideration of issues such as spectrum rights, coordination obligations, permissible use, and the regulatory safeguards necessary to ensure transparency and non-discrimination.
4. Questions relating to the use of IMT spectrum for satellite based D2D services, including whether IMT bands should be permitted for this purpose, which specific bands are suitable, and whether only frequency division duplexing (“**FDD**”) bands should be considered.

Charging framework and financial conditions

1. Whether charges paid by service entities to SCN entities for SCNaas should be regulated, and what parameters such as service level agreements metrics and spectrum-use components should inform such regulation. The SCN Consultation Paper also examines whether SCNaas charges should be deductible from the service provider's Applicable Gross Revenue ("**ApGR**") and how corresponding revenues should be treated for the SCN entity, requiring clarity on definitions of Gross Revenue ("**GR**"), ApGR and AGR specific to SCN operations.
2. Financial thresholds applicable to SCN entities, including entry fees, authorisation fees, minimum equity/net-worth requirements and bank guarantee obligations.

TRAI releases consultation paper on the Regulatory Framework for Vehicle-to-Everything (V2X) communication

The TRAI, on April 30, 2026, released its consultation paper on the Regulatory Framework for Vehicle-to-Everything ("**V2X**") Communication, seeking stakeholder inputs on authorisation, spectrum assignment, cybersecurity and deployment conditions for Intelligent Transport Systems ("**ITS**").

The consultation broadly covered the following:

Overview and scope

1. Whether a specific authorisation is required for Vehicle-to-Infrastructure ("**V2I**") communication services under Section 3(1)(a) of the Telecom Act, and if so, the appropriate eligibility conditions, period of validity, service area, scope of services, and technical, operational, and security related obligations that should apply to entities deploying and operating Roadside Units ("**RSUs**"), along with any additional conditions necessary to ensure coordinated deployment and interference free operation.
2. The applicability of mandatory testing and certification of telecom equipment to the OBUs and RSUs, including whether both should be brought within the certification regime and, if not, what alternative mechanisms should be adopted to ensure compliance with electromagnetic interference, electromagnetic compatibility, safety, technical, and security requirements prescribed by the DoT and the Telecom Engineering Centre.

Cybersecurity and spectrum assignment

1. The design of a cybersecurity, authentication, and privacy protection framework for ITS/V2X in India, including the appropriateness of a Public Key Infrastructure ("**PKI**") based trust model, the choice of implementing agency, and mechanisms to ensure coexistence with India's existing X.509-based PKI operated by the Root Certifying Authority of India.
2. The framework for assignment of spectrum for V2I communication services, particularly in the 5.875–5.905 GHz band (30 MHz) proposed for initial Cellular-V2X ("**C-V2X**") deployment, including whether spectrum should be partitioned between safety critical and non-safety applications, whether assignment should be exclusive or shared, and how simultaneous operation by multiple authorised entities in the same geographic area should be managed.

Interference management and deployment conditions

1. The technical and regulatory mechanisms for interference management, including whether parameters such as minimum antenna directionality, protection distance between RSUs, maximum antenna height, and prescribed radiated power and out-of-band emission limits should be mandated, and whether recommendations of the Ministry of Road Transport and Highways task force on power and emission limits should be adopted.

2. The period of spectrum assignment, roll-out obligations, and surrender mechanisms, including the appropriate duration for administratively assigned spectrum, the need for timelines to ensure timely deployment of V2I services, and provisions for surrender or re-allocation of spectrum in case of non-deployment or cessation of operations.
3. The requirement for prior approvals or siting clearances for RSU deployment, including whether a mechanism analogous to Standing Advisory Committee on Frequency Allocation clearance should be mandated, or whether lighter-touch reporting or GIS-based registration mechanisms would suffice.

Spectrum charges and financial conditions

1. Whether spectrum charges should be levied for V2I communication services, considering the public welfare-oriented and safety-critical nature of V2X, and if so, the appropriate methodology for such charges, including whether DoT's spectrum charging framework should be adopted, whether AGR based charging is appropriate, or whether alternative cost recovery or differentiated charging mechanisms should be considered.
2. The appropriate definitions of GR, ApGR, and AGR for V2I communication service authorised entities, including identification of potential revenue streams, exclusions for safety related or non-commercial services, and safeguards to ensure simplicity, transparency, and regulatory certainty.
3. Other financial conditions applicable to V2I communication service authorisation, including entry fees, authorisation fees, application processing fees, bank guarantee requirements, and minimum equity or net-worth thresholds, taking into account the likely participation of public authorities such as city bodies and highway agencies and the objective of facilitating early stage deployment of V2X infrastructure.

Bombay High Court quashes retrospective one-time spectrum charge demand against Bharti Airtel and Vodafone Idea

In a significant ruling reinforcing contractual certainty in telecom licensing, the Bombay High Court has quashed DoT's retrospective one-time spectrum charge demands against Bharti Airtel Limited and Vodafone Idea Limited. The judgment, dated June 8, 2026, held that a unilateral retrospective levy without statutory or contractual backing was unsustainable.

The Bombay High Court held as follows:

1. a licence under the proviso to Section 4(1) of the Telegraph Act is contractual in nature, and any additional charge must trace its source to statute or contract; neither the 1994 licence agreements nor Clauses 5.1, 18.3, 23.5 and 43.5 of the 2005 Unified Access Services licences empowered DoT to retrospectively impose a one-time spectrum charge;
2. under NTP-99, spectrum up to 10 MHz had been allocated against incremental revenue-share increases, and DoT's own communications and TRAI's recommendations consistently showed no one-time charge was contemplated for spectrum up to that threshold;
3. modification clauses permitting changes in public interest, national security, or proper conduct of telegraphs could not justify the levy, since revenue maximisation does not equate to public interest, particularly given NTP-99's stated focus on universal service, rural penetration and affordability; and
4. a unilateral retrospective levy, absent any contractual modification or identified source of power, was inconsistent with the principle of certainty of consideration in concluded contracts and with licensees' legitimate expectations.

The Bombay High Court allowed the petitions, quashed the impugned decisions and demand notices, and directed the return of bank guarantees furnished by the petitioners.

Delhi High Court upholds TRAI's twelve minute per clock hour ceiling on television advertisements

The Delhi High Court, on May 29, 2026, dismissed 17 (seventeen) writ petitions filed by the general entertainment, news, and regional broadcasters challenging the constitutional validity of Rule 7(11) of the Cable Television Networks Rules, 1994 and Regulation 3 of the Standards of Quality of Service (Duration of Advertisements in Television Channels) Regulations, 2012, as amended in 2013 (together, the "**Impugned Regulations**"), which imposed a uniform ceiling of 12 (twelve) minutes of advertisements per clock hour. The petitioners argued that the restriction violated Articles 14 and 19(1)(a) of the Constitution of India ("**Constitution**") as an infringement of commercial speech, that TRAI lacked competence to regulate advertisement duration, and that the cap, combined with the 2017 tariff order's subscription-fee ceiling, created a dual squeeze on revenue.

The Delhi High Court held as follows:

1. TRAI's power to regulate advertisement duration falls within its mandate to prescribe quality-of-service standards under Section 11(1)(b)(v) of the TRAI Act, 1997 (which empowers TRAI to lay down service quality standards for telecom service providers) ("**TRAI Act**"). Since broadcasting and cable services were brought within 'telecommunication service' by a 2004 notification, this extends to viewer-experience regulation, and the Impugned Regulations are validly made under the delegated rule-making power in Section 36 of the TRAI Act;
2. spectrum and airwaves are scarce public resources held by the State in fiduciary capacity, and the framework's nexus to equitable use under Articles 39(b) and 39(c) of the Constitution brings it within Article 31-C's protection from challenge under Articles 14 and 19 of the Constitution (Article 31-C shields laws giving effect to the Directive Principles in Articles 39(b)/(c) from being struck down as violative of Articles 14 and 19 of the Constitution);
3. independently of Article 31C of the Constitution, loss of advertising revenue falls within Article 19(1)(g), not the core of 19(1)(a), and reasonable restrictions under Article 19(6) of the Constitution are permissible since the Constitution does not guarantee broadcasters a particular profitability or unlimited right to monetise public spectrum; and
4. the Article 14 challenge failed, as the distinction between programme content and advertising time is intelligible and rationally connected to protecting viewer experience, with the measure preceded by consultation and benchmarked internationally.

The Delhi High Court dismissed the petitions and upheld the Impugned Regulations as a valid exercise of regulatory power.

Telecommunications & Broadcasting Practice

Our Communications practice is handled by a team with specific domain-expertise, and we advise various stakeholders in both Telecom & Broadcasting sectors on a wide range of transactions and assignments that involve constitutional, legal, contractual, commercial, regulatory and policy advice. We advise broadcasters, BPOs, Internet Service Providers (ISPs), operators and investors in the Global System for Mobile Communications (GSM) and the Code Division Multiple Access (CDMA) technologies, and new investors on diverse licensing issues, entry strategies, structuring, national security challenges, and other regulatory issues. Some of the main aspects handled / negotiated / advised by us include commercial arrangements; mergers & acquisitions (including FDI) and joint ventures; spectrum allocation; communication satellites; and regulatory compliances and strategic advice including handling regulatory proceedings. We represent the interests of licensees and other stakeholders in interacting with the licensor and regulators with respect to reforms in the regulatory and policy framework to facilitate business growth drawing upon international best practices. We advise and represent investors, broadcasters, and telecom licensees on commercial transactions in this sector, including restructuring, divestment, licensing, and project financing (vendor financing and corporate finance). We advise telecom service providers and other corporate houses on all aspects of spectrum licensing and allocation, including fundamental issues relating to the scope of spectrum bands, the regulatory framework governing their allocation in India, and planning, strategising and following up on their application to the Government. We advise and represent diverse entities in proceedings before the concerned licensing, regulatory, judicial and quasi-judicial authorities (including DoT, MIB, TRAI, TDSAT, various High Courts and the Supreme Court). In such proceedings we assist clients in developing strategies, render opinions, draft pleadings and lead/assist in the proceedings. We have a strong track-record of providing quality advice and concrete results to the above segments of the communications industry, and have been engaged in handling the key legal, regulatory and policy issues that have historically arisen in the industry.

This Newsletter is prepared by:



Tony Verghese
Partner



Radhika Gupta
Partner



Uddhav Gupta
Associate



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20 Ranked Lawyers



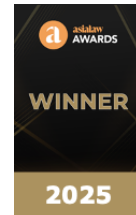
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For more details, please contact km@jsalaw.com

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