

To:
**The Secretary,
Department of Space (DoS),
ISRO Hqs, Antariksh Bhavan, New BEL Road, Bengaluru-560 231**

Respected Sir

SUBJECT: Compendium of Startup/SME Views & Suggestions Reg.

We take this opportunity to introduce ourselves and present a consolidated compendium of views that Indian Private Space Startups/SMEs wish to work on with your esteemed self and your organization, in order to make the upcoming changes planned by DoS to accelerate the growth and potential impact to the Indian private Space sector.

SpaceFed is a Non-Profit initiative and Industry Association with the aim to advance moderate and streamline the interests of our members in government, media, industry and public affairs while at all times, striving to build a foundation for a sustainable, consensus driven, and thriving Space ecosystem in India. SpaceFed will strive to assist Private Indian Space Startups/SMEs to work with Gol channels to boost the sector in terms of:

- Policy and Regulation
- Increasing Awareness
- Networking & global outreach

The following section is a compilation of views from **20** Private Space Startups/SMEs, working in various domains and subdomains of the Space Sector.

We look forward to working with the bold endeavors that Gol has undertaken and partnering IN-SPACE in its mission to enable and promote the Private Space ecosystem in India.

Yours Faithfully,



Sridhar Ramasubban



Kris Nair



Pawan Chandana

Founding Members, **SpaceFed**

CONSOLIDATION OF VIEWS/SUGGESTIONS BY PRIVATE SPACE SECTOR

1. Stakeholder Representation

- Active Start-up/SME participation in Govt. Policy and Decision-Making Bodies.
- Start-up/SME Composition of INSPAC-e Board and Evaluation Committee.
- Co-development and co-funding of high stakes projects between SMEs and IN-SPACE.

2. Facility Utilization

- Simplified usage of ISRO facilities with an online portal for requisitioning, booking and approvals.
- Start-ups to be charged minimally/actual cost basis on consumables and minimum insurance fee where there is concern on usage of expensive equipment.
- IN-SPACE should work with industry in establishing clear guidelines to enable minimal premium for insuring Private Space activities from testing to operations and shall fix an upper cap in advance.
- Open up ISRO infrastructure/facilities or establish separate rocket test zones to conduct model, amateur and experimental rocketry events, activities and competitions.

3. White Paper on IN-SPACE to be released explaining:

- Role and function of IN-SPACE, Approach to Legal/Regulatory, Procedural and Management elements; Composition of INSPAC-e Board and Evaluation Committee.
- Eligibility criteria and process for evaluation and acceptance/rejection of applications;
- Goods & Services which Private Sector will be authorized/permitted to integrate into the international supply.
- Develop a long-term Policy Vision along with the Implementation Roadmap by combining the potential of Indian Private Space Sector companies.

4. Regulatory Clearances & Licensing

- Establishing clear licensing guidelines and provide single window clearance for all licensing requirements including, but not limited to Launch, Spectrum, Operating Satellites/Ground stations etc.
- Clearly defined timelines for responses on clearance/next steps via a portal.
- Communication System providers should also be allowed to set up ground stations in India in a seamless manner for enabling more robust in-space testing.

5. Data Access

- EO Data should be openly available and easily accessible to Indian Companies for free to provide an internationally level playing field to the Indian operators.
- There should be a licensing, audit and traceability mechanism built for facilitating buying of EO imagery directly from satellite operator or reseller.
- High Resolution EO data purchase threshold should be reduced to 50cm from the current 1m, as there are a lot of civilian applications.

6. Funding and Market Creation

- Constitution of a Space fund by Gol to invest in emerging Space start-ups on either Equity basis or Grant basis (Ministry of Agriculture recently did the same by allocating funds to support 112 Agri-tech start-ups in India).
- Allow Start-ups/MSMEs to directly take part in the RESPOND program, Announcement of Opportunities (AO's) & Expression of Interests (EoIs). These are currently only for academic institutions or have revenue prerequisites.
- Request for removal of GST for launch of satellites manufactured in India by Indian Launch Vehicles in similar lines as foreign satellites launching from India. This would increase the competitiveness of Indian satellite manufacturers in the global marketplace.
- Create a focused program to strategically fund and support home-grown solutions which can replace current imports and enable development of new critical technologies or materials.

7. Outreach & Capacity Building:

- Need for improved outreach by the Indian space program, to create a highly skilled human resource pool and enable students, enthusiasts and professionals to be able to closely participate in and view the Indian space program.
- Individual ISRO centres should have a focused incubation centre on campus which would allow for better dissemination of knowledge.
- Create a Comprehensive & Structured Space Education Program which can cater to students at various levels and enable them to become industry ready. This will go hand in hand with the NEP 2020 and create a strong workforce for the space industry.
- Opportunities for Startup/MSME participation in national and international space exhibitions and events
- Create a knowledge repository covering the major aspects of space technologies for building satellites and subsystems, launch vehicles, ground segment equipment etc.
- IN-SPACE could consider formally instituting a division within itself involving social scientists, economists and space technologists to create a framework to map and monitor space activities' contribution to the economy. This can help policy makers make data-driven decisions and keep track of competitiveness in global scale.

The consolidated compendium of views presented in this letter has been compiled with suggestions from the following 20 private Start-ups/SMEs:

S. No.	Name of Organization
1	Astrogate Labs
2	Azista Industries
3	Bellatrix Aerospace
4	Blue Sky Analytics
5	CyberEye
6	Dhruva Space
7	Digantara Research and Technologies
8	Dua Associates law Offices
9	Institute of Productivity
10	Kawa Space
11	Manastu Space
12	NoPo Nanotechnologies
13	Pixxel
14	Rocketeers
15	Satsearch
16	SatSure Analytics
17	Skyroot Aerospace
18	Transcend Satellite Technology LLP
19	Vestaspace Technology
20	Xovian Aerospace

CC To:

1. Principal Secretary to PM
2. Joint Secretary (DoS)
3. Scientific Secretary (ISRO)
4. Director – CBPO
5. Director – STPO
6. CMD Antrix
7. CMD NSIL