

31<sup>st</sup> Jan, 2012



The Secretary,  
Telecom Regulatory Authority of India,  
Mahanagar Doorsanchar Bhawan,  
Jawahar Lal Nehru Marg (Old Minto Road),  
New Delhi-110002

**Kind Attention: Principal Advisor (MN)**

**Sub: Consultation Paper on "Allocation of Spectrum Resources for Residential and Enterprise Intra-telecommunication Requirements / Cordless Telecommunication system (CTS)"**

Dear Sir,

At the outset we would like to submit that Idea Cellular endorses the views of the COAI on the above-mentioned Consultation. Our additional comments in view of the same are as follows:

- Indian Mobile telephony market is almost in the maturity phase of its growth cycle meaning thereby that it has already moved past the stage where introduction of a technology like CTS can add any value to the overall customer experience. The Authority will appreciate that any or all of the services that CTS can offer are already being provided by existing licensed UASL/ CMTS and that too with great success, so much so that India is already the World's second largest mobile telephony market.
- It is pertinent to note that spectrum is a scarce national resource, the economic value of which needs to be preserved and put to use for facilitating socio-economic development within the country. Allocating any additional spectrum for the purposes of a single niche technology would be a highly inefficient use of valuable spectrum, both in the context of the already prevailing spectrum shortage and the future anticipated spectrum requirements. Further, it may be noted that the same would also be inconsistent with the basic and established principles of telecom licensing as well as that of technology neutrality.

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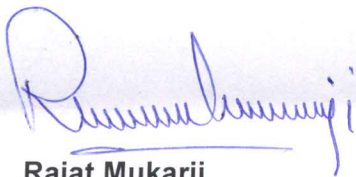
- c. Any proposal to allow CTS on unlicensed spectrum is likely to enable the operation of communication services that are potentially substitutable for licensed mobile services thereby giving rise to serious competitive distortions, since the same service would then be provided by one set of operators at zero or no regulatory cost while another set would be subjected to the agreed license fee and spectrum usage payments. It will thus be inappropriate to consider allocation of de-licensed spectrum for CTS.
- d. The immediate proximity to the GSM1800 band and UMTS2100 UL is likely to have capacity impact on the Uplink of 3G. Consequently, the radiation from CTS mobiles and their BTSs is likely to interfere with / degrade the quality of voice for 3G users and in residential complexes it may also lead to deterioration of the in-building coverage for 3G systems. It is also pertinent to note here that in the event of allowing CTS on unlicensed band it may not be possible to control the number of players, and hence the level and extent of interference – thus there is a strong likelihood that CTS may lead to deterioration in the overall quality of service to the existing mobile subscribers, both individual and enterprise. The same is also suggested by many studies across the globe.

We earnestly believe that the Authority will give due-consideration to our comments before formalizing its recommendations on this subject.

Thanking you,

**Yours faithfully,**

**For IDEA Cellular Ltd.**



**Rajat Mukarji**

**Chief Corporate Affairs Officer**