

Date: 5th Mar12

KSSVAS

Research Scholar in Management Studies

vasu.researchscholar.au@gmail.com

To

Shri Sudhir Gupta, Pr. Advisor (MS), TRAI, New Delhi (email: pradvmn@traigov.in)

SUB: Comments on Consultation paper – reg.

REF: Consultation on Draft Guidelines for Unified Licence/Class Licence and Migration of Existing Licences, dated 10th Feb12.

The revised comments on above consultation paper are as follows:

- 1) At point 1.4 of page no.1 it was mentioned that “**without any restriction on the number of licences**”. This meaning is gives us as “**Infinite Unified Licences**”. Need of “infinite Unified Licences” in an area (National/service/district/metro) not mentioned in this document.
- 2) Not mentioned in this consultation paper about physical operators, service operators, National MNP, etc, **which were mentioned in “Draft NTP11”**.
- 3) There is **no argument provided** in this document about the reasons for going for “unified or class”, without getting the outcome of NTP11.
- 4) How to interconnect “infinite unified operators” not mentioned.
- 5) How the present “Numbering Scheme” applicable for “infinite uniform operators” not mentioned.
- 6) If “infinite unified licensees” able get spectrum and started operations, then, how the environment will be protected from (a) future e-waste generated through Telecom equipments/ infrastructures & faulty/outdated Customer end devices such as mobiles, hand held devices, etc. (b) Increase of Green House Gases due to increase of energy consumption at wireless towers.
- 7) If a licensee surrendering it’s licence, it was not mentioned about (a) how to dispose it’s equipments, infrastructure without harming to the human habitat and environment of the nation. (b) What about their customers? (c) Is there is any “MNP” similar provision for all other types of services offered under “unified licences” under this fresh “infinite unified licences” mechanism/system.
- 8) Every licensee has to get new customers, and at the time of enrolling customers, each licensee needs to collect various documents (in general photo proof, address proof). In this regard, what platform is available in the nation, to verify the originality of the documents collected by the license at their POS (point of sale)? We all know that Adhaar based bio-metric verification system will take more than 3 to 5 years.
- 9) Due to technology advancement, the technology shift is un-avoidable to every licensee, so safe disposing (in all respects, i.e. to human habitat, environment, etc. of the nation) of out-dated equipments is necessary. What methodology is going to imposing on each licensee for safe dispose of their out-dated equipments/infrastructures? And how it will be enforced in India? Is present staff & mechanism is sufficient to enforce such measures among all “infinite unified licensees”?
- 10) **Instead of** “Unified Licence” or “Class Licence”, **it is suggested the following for consultation:**
 - a. Licence for “**Physical Network operators**” who own and maintain all passive & active components of telecom infrastructure, such as **central equipments, distributed equipments, Primary Reference Clock, transmission media, etc. on allotted spectrum.**

- b. Licence for “**Service Delivery operators**” who do **not require owning spectrum**.
- c. “Service delivery operators” and “physical network operators” will function on revenue shared basis.
- d. There should be **limited “Physical network providers”**. This is because to minimize the future e-waste, minimize the energy consumption & minimizing the consumption of natural resources (not merely spectrum) because of multiple infrastructures (passive & active).
- e. There may be **finite “service delivery operators”**.
- f. The above a, b, c, d is for optimum utilization of natural resources, reducing interconnectivity between multiple operators & technologies, effective utilization of spectrum, minimizing the number of towers.
- g. The Physical network operators will concentrate on passive & active telecom infrastructure & network maintenance, operations, up-gradations & scrapping discarded ones. Whereas Service Delivery Operators will concentrate on delivery of services to customers, marketing, sales, etc. This leads for better quality of services as well service delivery.
- h. **Migration of existing licensee to this new indianized business model**.

KSSVAS

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Vas.KSS

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- 10) Instead of “Unified Licence” or “Class Licence”, it is suggested the following for consultation:
 - a. Licence for Physical service providers with passive & active with spectrum.
 - b. Licence for Service delivery provides with out spectrum.

- c. Service delivery providers and physical services providers will function on revenue shared basis.
- d. There should be limited Physical service providers. This is because to minimize the future e-waste, minimize the energy consumption & minimizing the consumption of natural resources (not merely spectrum) because of multiple infrastructures (passive & active).
- e. There may be finite service delivery providers.
- f. The above a, b, c, d is for optimum utilization of natural resources, reducing interconnectivity between multiple operators & technologies, effective utilization of spectrum, minimizing the number of towers.
- g. The physical providers will concentrate on network maintenance, and service delivery operators will concentrate on quality of service delivery.
- h.many advantages with this indianized business model.

Vas.KSS

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