

Your Ref: TRAI Consultation paper 14/2019, dated 19th Sep 2019.

To

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SUBJECT: Comments on Consultation paper on “Reforming the Guidelines for Transfer/Merger of Telecom Licenses – Regarding.

Respected Authorities:

The following is submitted **against Q4:**

One Nation – One License:

Merge all LSAs in to one license area.

This will enhance and optimize the telecom operations (example: Single point inter-connections across nation among various operators, reduced technical network complexity, etc.), thus make things simple & ease

May keep regional special conditions (ex: J&K, NE, etc.)

Maximum Number of National Licensees:

Proposed as follows:

One Govt. Operator (Say BSNL+MTNL)

Maximum 3 to 4 Private Operators

Total: 4 to 5 (Say 20 to 25% of market share by each operator, hence total maximum 4 to 5)

“0” USOF but 100% coverage:

Data & Voice services are to be made available in all the villages/towns/cities & connected Roads irrespective of far/remote/difficult areas by the service providers themselves. Incremental penalties (Yearly) are to be prescribed for non-coverage area.

“0” cost spectrum:

Service providers are not selling spectrum in retail as in case of mining “selling Ore from Mines”

Here, they need to plan, procure, install, maintain & upgrade highly sophisticated telecom equipments across the service area for smooth delivery of telecom services up to the expectations of the customers by keeping huge costs against man power, power, fuel, etc. In addition to the costs towards implementation of regulations (ex: MNP, ever changing versions of KYC/CAF, etc.). Whenever new technology evolved (2G – 3G – 4G – 5G –etc.), every time needs to invest on network technologies & up-gradations. If, spectrum costs are also included, business will be un-viable leading to paralysations of telecom services in the nation or monopoly.

Hence, spectrum costs are to be nullified at the earliest.

Annual License fee only to be charged based on AGR.

Even Upcoming 5G spectrum to be provided @ “0 cost spectrum” to all existing operators equally

Hope above suggestions will help to enhance better telecom services in our Nation.

Regards

SSVAS

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