



24<sup>th</sup> February, 2012

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New Delhi.

**Sub: Comments to TRAI Consultation Paper No.3/2012 on 'Draft Guidelines for Unified License/Class License and Migration of Existing Licenses'.**

Dear Sir,

This has reference to the above Consultation Paper, we would like to submit our comments as under:

Sr No	Clause No.	Comments
1	<b>Clause 2.3 Chapter I (NET WORTH)</b>	<p>As per TRAI draft guidelines, the net-worth requirement of the three categories of applicants for unified license are:</p> <ul style="list-style-type: none"><li>• Rs 25 crore for National level Unified License</li><li>• Rs 2.5 Crores for per Service Area license and</li><li>• Rs 25 Lakh for per District level license.</li></ul> <p>In our opinion, the Net-worth requirement for Service area and District area license is very high for the new entrants and may be discouraging. To encourage competition in this field, we propose that the Net-worth requirement for the two categories should be as follows:</p> <ul style="list-style-type: none"><li>• <b>Rs 1.5 Crore per Service Area Licence</b></li><li>• <b>Rs 10 Lakh for per District level Licence.</b></li></ul>
2	<b>Clause 11.2 Chapter I (LICENCE FEE)</b>	<p>We are of the opinion that for the new entrants, levying of the minimum license fee should start from third year onwards since they will need 1 to 2 years to establish the network, run the services and generate revenue.</p>
3	<b>Clause 10, Chapter III 'Migration of existing license to unified license'</b>	<p>It is suggested that the IP-1 should be allowed to continue under the existing procedure of Registration. The entry fee as per the Unified Licensing regime should not be applicable for IP1.</p>

Yours sincerely,  
For **Vihaan Networks Limited**

Authorized Signatory