

To  
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(through email ID advmn@traigov.in)

**SUB:** Your CP on Telecommunication Infrastructure Sharing, Spectrum Sharing, and Spectrum Leasing

The follow are counter comments on the subject noted above:

Let me first express happiness about the information that “DoT is rolling out mobile coverage to un-connected villages by spending huge funds and by laying Optical fiber cable”. Happy to see such step from this Govt., where private players unable to full-fill their responsibility.

Regarding this CP, it seems, nearly 20 stakeholders responded, but seems the following are yet to take into consideration before going forward:

- 1) One Nation – One LSA: I.e the **age old concept** of multiple LSAs to be overcome, keeping in view of present / future scenario of this sector. First to merge all earlier LSAs into one “National LSA”, and worth to reduce complexity in our present multi-LSA system and reduce burden on service providers.
- 2) At present, very few stake holders present in our Nation (JIO, AIRTEL, VI, BSNL), why to make complexity on infrastructure sharing (active / passive) or spectrum sharing/trading/leasing? In addition to this, one more CP released in the name of DCIP....!!! Make system simple, with Network Providers, Service Providers and Hybrid Providers of any matrix/size.
- 3) The **basic philosophy** of utilizing spectrum is to be reviewed as proposed below, so that the complexity of sharing/leasing/trading/auctioning does not arise:  
As per my remembrance,  
Around 2010 once telecom service providers (TSPs i.e. entities) spent huge to procure 3G spectrum  
Around 2016 once again TSPs spent huge to procure 4G spectrum  
Now in 2022, TSPs need to spend to procure 5G spectrum  
As above, for every 5 to 6 years, TSPs needs to spend huge capital investment for procurement of spectrum. I.e., before getting return on investment (ROI), TSPs are investing again and again on spectrum. This is adversely affecting the balance-sheets of Telecom companies and happening to pay huge interests to banks, yet times threat to bankruptcy/insolvency. We all witness vanishing of multiple TSPs in past few years.  
Not only procuring spectrum, TSPs needs to spend a lot for rolling out new telecom gear whenever there is shift spectrum from one “G” to another “G” and to maintain/operate it.  
Comparing to initial days of before and after 2000 year, now Government is receiving **huge** service tax/GST through mobile recharge/bills paid I.e. TSPs are generating huge tax revenue to the nation through their customers. (As well, other entities also generating such huge tax revenue through sale of mobile instruments/ accessories/gadgets)  
Keeping in view of above, it is suggested w.r.t utilization of spectrum as follows:
  - a) Allot spectrum to all the existing TSPs who are in wireless business at free of cost
  - b) Allot spectrum for new TSPs by collecting one time fees for “wireless licenses” i.e to use spectrum to deliver telecom services to end users. This one time fees is to be arrived basing on the Industry Average Revenue Per User Over A Period (I ARPU OAP).
  - c) For all existing TSPs, the amount earlier paid while procuring spectrum, is to be settled basing on the above “I ARPU OAP” and they can clear all their earlier bank loans raised for spectrum procurement.
  - d) Whenever there is a shift of technology and it is required a new range of frequencies (spectrum) allow TSPs to surrender old spectrum and they may be allotted new spectrum without any auction/collection of fees towards new spectrum without effecting services to users.
  - e) No other charges on spectrum like periodical spectrum usage charges, etc.
  - f) By doing this way, TSPs are less burdened towards spending on spectrum payments again and again as well they able to invest such funds to improve quality of services for the benefit of end user/consumer.
- 4) Due to using of various spectrum bands, there will be issue for user devices (mobile instruments, etc.), like the cost of such devices may increase basing on number of bands that a single user device needs to handle while in home/moving/roaming. Please ensure this.
- 5) Earlier, expect radio &TV EM waves present around us.  
Now, lot of electromagnetic (EM) waves such as 2g, 3g, 4g, 5g, wi-fi, radio FM/AM, DTH, TV, satellite,etc..... around us simultaneously.  
An independent research is to be done in India, to understand the efforts of such multiple wireless waves/ EM waves on the environment (including greenery, birds, people, children, pregnant, water, etc....). Such research / investigation is to be done locally (with in India) in periodical manner for better observations. The results are to be analyzed for remedial actions. Necessary rules, guidelines are to be prescribed. If already done in India (Aatma Nirbhar), such results are to be published. Finally, we all need to live healthy also in addition to the comfort.  
Hoping at least **ONE** such Lab existing in our Nation.
- 6) Even Department of Labour asked all departments/sectors to prepare OSHA (occupational safety & health Administration) standards basing on the nature of works in their sectors, there is no clear OSHA standards for telecom riggers (who work on telecom towers). Till date Lakhs of mobile towers installed without such Indian OSHA standards. At least now, let develop OSHA standards for various areas of work in telecommunication to protect safety & health of people working. **Before**, starting of rural 4G tower works, GOI/DOT need to ensure these OSHA guidelines.

Vande Bharath  
Vas KSS

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