

To  
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**SUB: Comments on Consultation Paper on “Valuation and Reserve Price of Spectrum: Licences expiring in 2015–16” dated 7th August 2014**

**Ref: TRAI’s Consultation Paper No.10/2014**

Respected authorities,

The consultation paper seems to be a routine, and it seems that, still our Nation is following old system (western pattern), which leads a dependent and never allow to stand on own feet. The following are the fundamental changes required before going for any fresh telecom licences or fresh allotment of spectrum:

**National Operators:**

- Bring National Operators by replacing existing regional / multiple LSA operations.
- Indian telecom areas were divided in number LSAs, might be 22 years back, when there is no concept of MNP, All India MNP, free National Roaming, Mobile data, M-Governance, Mobile banking, Mobile apps, Jan-Dhan scheme, etc., which are dominating present and future era of telecom domain.
- Unifying entire Indian telecom sector as a single National LSA leading to reduce the network complexity and improved secured telecom echo system.
- Virtual Operators will be a solution for local or regional operations.

**Indianized model:**

- At one time, policy makers needs to thought of Indianized model for better delivery of communication services across India, keeping in view of new Govt. initiative “Digital India”.
- Instead of allowing “ready made” and “imported technologies”, see that incorporation of Indian Needs, while deploying telecom gear in India, which leads for local manufacturing and future exporting opportunities .

**100% coverage of Services:**

- Paying USO contribution is not to be the solution for not extending services to remote villages/areas by licensed provider.
- Arranging a parallel Govt. arrangement in the name of NOFN is not a viable solution keeping practicality of operations in long term.
- Hence, coverage/delivery telecom service to every village is the prime responsibility of every licensee

**To achieve above:**

- Provide options for all existing operators to become National Operators
- Re-configure multiple LSA system in to single “National LSA” (Keeping special conditions to NE, J&K, etc. areas, if still deemed fit).
- Arriving maximum possible number of National Operators
- On expiry of existing licences or spectrum ownership, further allotment of licences or allotment of spectrum is to be done on “National LSA” basis only.

Hoping a good out come, best of luck....

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