

## **BHARAT JYOTI CONSUMER PROTECTION COUNCIL, LUCKNOW**

### **CONSULTATION PAPER ON RESERVE PRICE FOR AUCTION OF SPECTRUM IN THE 800 MHz BAND**

#### **Comments of Bharat Jyoti Consumer Advocacy Group:**

**Q1. The quantum of spectrum in the 800 MHz band should be same as currently available spectrum in 800 MHz band ( Number of carriers actually available at hand);**

**Q2. The ideal block size should be 5 MHz for truly liberalized spectrum use, so that TSPs could use any technology or any service and also utilize the new technologies like UMTS, LTE;**

**Q3. The value of 800 MHz spectrum should be derived independently, independent of valuation of other bands viz. 1800 or 900 MHz bands;**

**Q4. The reserve price for 800 MHz band should not be fixed more than the 1.3 times the valuation of 1800 MHz band, as the revenue from non-voice services may still be less than 25% in the next 10 years. Moreover, if the block size is not kept as 5 MHz, then more efficient technologies like UMTS and LTE can not be deployed and taken advantage of higher efficiency, to generate higher revenues.**

**Q5. The potential growth in data services may not be as much as assumed. So the reserve price could not be based only on assumptions;**

**Q6. No comments;**

**Q7. It could be the reference but corrected proportionately as the revenue of non-voice services will still remain somewhat low in our country, for quite some time;**

**Q8.No comments;**

**Q9.It should rightly be 75 to 80% of the valuation or the auction price realized,whichever is lower;**

**Sd.M.K.GARG**

**Convenor,Bharat Jyoti Consumer Advocacy Group**