

## **BHARAT JYOTI CONSUMER ADVOCACY GROUP,LUCKNOW**

### **Issues for Consultation on MVNOs**

**Issue 1)** It should be modified as” MVNO licensee is an entity that does not have assignment of spectrum for access services but can provide wireless (mobile) Value Added Services to customers by sharing the spectrum of the Access Provider(UAS/CMTS licensee).The justification being that the MVNOs should be restricted to provide only the VASs and not the VOICE telephony.

**Issue 2)** We feel this is the right time to introduce MVNOs in the Indian Telecom. Market.However,he must be given a distinct license and brought under regulatory framework of India.There is enough competition in Voice Telephony amongst MNOs.MVNOs will further raise the competition. The VASs are still evolving in the Indian Market.MVNOs will be in a better position to introduce and sell VASs specific to needs of different segment of the society.

**Issue3)** He may be allowed to have its own Infrastructure like MSC,HLR,IN Platform

**Issue4)** to Issue 6) No comments;

**Issue 7)** There should be only one MVNO per MNO per service area.However,MVNO can have a tie up with more than one MNO in different service areas.

**Issue 8 to 11)** No comments;

**Issue 12)** There should be suitable clauses introduced in the license for safeguarding the intetrests of the subscribers,in case the agreement between a MNO and the MVNO fails.

**Issue 13)** There may not be any rollout obligation for the MVNO.It is only MNO,who is responsible for the fulfillment of rollout obligations in the given service area.

**Issue 14 to 18)** No comments;