

Subject: **Response to TRAI Pre-consultation paper on 'Delinking of license for networks from delivery of services by way of VNO' dated 3rd September, 2014**

Date: 17/09/14 12:55 PM
From: A Kumar <A.Kumar@futuregroup.in>

To: advmn@traf.gov.in <advmn@traf.gov.in>

Dear Shri Sanjeev Banzal,

At the outset we welcome the consultation process initiated by TRAI on the important subject of 'Delinking of license for networks from delivery of services by way of virtual network operators'. We are pleased to file our comments as below.

A) We believe that the Indian consumers will be benefited immensely with the de-bundling of the license to introduce the concept of Service Delivery Operators (SDOs). Consumer facing entities are best suited to serve the evolving customers' needs on their telecommunication demands as they will ensure:

Service personalization catering to customer's lifestyle, interests and needs

Availability of the offering as per Segment's preferred channel of distribution

Large variety of offerings through cross links with other industries and products

Telecom offerings to benefit from pre-existing heavy investments towards services excellence for consumers

Tariffs will not only be defined by plain vanilla telecom offerings but can be bundled with other product categories to make a holistic customer proposition

B) There will be significant benefits to Network Service Operators (NSOs) that offer SDOs wholesale access to their mobile networks in terms of:

Extending mobile services to market segments that NSOs have not had much success previously

Better network utilization and realization of economies of scale

Lower operational cost

Effective product bundling and cross selling.

We also believe that SDOs are allowed to use network of more than one NSO Licensee in different circles as per the requirement of the SDOs, and not restricted to a single NSO licensee only. This will enable the SDOs to partner with the best possible options basis market dynamics

C) With respect to the issue of spectrum usage charges in the NSO/SDO scenario, the NSO should pay for the spectrum usage charges as per the current defined slabs since the SDO will pay for wholesale access to the NSO.

We request the Authority to hold Open House Discussions on these issues where these issues can be deliberated more.

Warm Regards,

Amit Kumar

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