

FICCI's Response to the TRAI's Consultation Paper No. 11/2004 on Spectrum Related Issues

At the outset, FICCI would like to welcome TRAI for taking the initiative in bring out the consultation paper on spectrum. We believe these policy issues on spectrum will play a critical role for the overall development of telecommunication sector

✍️✍️ Currently in India, the Wireless Planning and Coordination (WPC) Wing of the Ministry of Communications is the radio regulatory authority responsible for nationwide radio spectrum management. It is important to note that the radio spectrum "is a critical natural resource. Accordingly, it is of the utmost importance that frequency should be managed with a focus on maintaining a fair and efficient national level playing field. Further, the recommendation should be in line with the national objectives that the telecom industry has to achieve specifically in increasing tele-density and coverage of the network across the country.

✍️✍️ As the apex body of various associations that represents manufacturers and users of wireless products and systems, FICCI has a direct interest in spectrum management policies that govern the availability and use of radio spectrum. Rapid changes in technology, liberalization of markets, globalization, and the public welfare are all dynamic forces that present a significant challenge to regulators. However, it is FICCI's position that these challenges can be met through strategic planning and recognition of the following fundamental principles that lead to optimal spectrum usage:

- Market-driven allocation and assignment;
 - Competitive service promotion;
 - Clear roadmap for spectrum management
 - Non-discriminatory procedures;
 - Regulatory flexibility and technological neutrality; and
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- International practices and coordination.

Essentially, it is the regulator's reliance on *market forces* – rather than government oversight – that allow for the most economically efficient use of spectrum, in the development of the most innovative technologies, and in the universal deployment of wireless services.

In fact, FICCI played a pioneering role in promoting the need for a new National Frequency Plan to replace the earlier system of allocating chunks of frequencies to various categories of users.

In this background, FICCI recommends a Five Point Agenda:

Clear cut spectrum policy:

Spectrum is a critical resource, which needs a proper policy to look after long-term objective of the nation. Therefore, there is a need for clear-cut guidelines and policy for vacation / relocation of the frequency Band on immediate basis to make available the required band for existing, upcoming users and new generation technology. Further, the policy should be transparent to create confidence among users. In other words, the policy should be formulated in such a manner that it meets the QoS requirement, aspirations of consumers. Besides, it should be transparent and help in achieving objectives of telecom density.

Technology Neutral Regime

The government has always encouraged a technology neutral concept for accelerating development of the telecom networks across the country.

Keeping the above objective in mind, it is essential to ensure that the new spectrum policy is technology neutral. Moreover, It should be left to the market forces and consumers to decide as to which technology is the best. Nevertheless, at the same time it should be ensured that the networks are upgraded to the latest technology thereby maintaining minimum quality standards.

✍ ✍ **Focused 3G Policy**

Telecommunication is the prime pre-requisite for the development of the other technologies as mentioned in the NTP-99. Therefore, it is imperative that a healthy environment should prevail to adopt and develop new generation technologies. 3G is the latest offering, which needs to be encouraged. Thus, it is necessary to come out with a focused 3G policy, which would present a roadmap for the roll out of the 3G services at the earliest. The spectrum allocated to roll 3G should be in line with the specifications suggested by ITU. ITU globally harmonized spectrum for 3G services (imt-2000) should be cleared on a level playing field.

✍ ✍ **Harmonization of national spectrum allocation with ITU specifications.**

ITU is the supreme body; they have a expertise in radio management with an objective to harmonize bands across countries. The existing government policies are technology neutral and any decision or recommendations prepared by TEC, WPC are sacrosanct & should match to NFAP to reduce conflicts. Moreover, harmonization of spectrum allocation policy with ITU specifications would lead to **economies of scale** and would **reduced interference** thereby ensuring maximum efficiency.

✍ ✍ **Optimal Spectrum Pricing**

Among the main objectives of NTP 94 and NTP 99, were to provide international quality services at affordable price. Keeping this in view, it is important to arrive at a pricing policy, which **will not put additional burden** on the consumers. At the same time, pricing should be such that this critical resource is used **efficiently**.
