

**To,  
Shri Sudhir Gupta,  
Principal Advisor (MS),  
Telecom Regulatory Authority of India,  
Mahanagar Door Sanchar Bhawan (Opp. Ram Lila Gr.),  
J.L.N. Marg, NEW DELHI – 110 002**

**Dear Sir,**

**Subject: Comments on “Allocation of Spectrum in 2G band in 22 Service Areas by auction”**

We at VOICE as part of our advocacy initiative in Telecommunications continuously raise different issues with Policy makers impacting consumers based on the knowledge through Consumer feedbacks.

As registered CAG with TRAI we are in forefront of providing inputs to TRAI related to consumer concerns and interests.

In continuation of this effort on behalf of telecom consumers we at VOICE have following response to the questions posed in the consultation paper:

**Q1 & Q2:** The objectives in order of priority should be –

1. Maximise public good thr’ maximum availability at minimum cost to consumer
2. Maximise revenue accrual to public exchequer
3. Optimum market competition
4. Equitable and just distribution of spectrum

**Q3:** No comments.

**Q4:** Yes the spectrum should be liberalised before auction to bring all the players to the same starting line. This will ensure competitiveness for the new entrants.

**Q5:** Third option is most suitable in the given circumstances as new entrants need a fair and equitable chance to compete without and technical disadvantage (if made to operate in a800 MHz band and above only).

**Q6:** Agreements with incumbent operators may be the main issues.

**Q7:** Same as Q5 above.

**Q8:** No comments.

**Q9:** A comprehensive approach is required to solve the spectrum issues for medium to long term.

**Q10:** The second approach is preferable.

**Q11 to Q13:** An all encompassing comprehensive approach including all bands should be adopted.

**Q14 to Q21:** No comments.

**Q22:** If a comprehensive all encompassing approach is adopted then all operators should be eligible. However if only the cancelled licenses are being considered then only effected operators should be eligible to participate.

**Q23 to Q25:** No comments.

**Q26:** The roll out obligation should be linked to spectrum and should be more stringent then earlier because ground is well prepared for the new operators.

**Q27 to Q31:** No comments.

**Q32:** Yes spectrum trading should be allowed to increase competition and optimise usage of spectrum provided fair market forces are in play.

**Q33 to Q36:** No comments.

Yours' Sincerely

Hemant upadhyay  
Advisor-IT & Telecom

Ashim Sanyal  
COO

[www.consumer-voice.org](http://www.consumer-voice.org)

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