



RSM/COAI/2014/03

January 15, 2014

Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg
New Delhi 110002

Subject: TRAI Consultation Paper on Reserve Price for Auction of Spectrum in 800 MHz Band

Dear Sir,

This is with reference to the TRAI Consultation Paper dated December 30, 2013 on Reserve Price for Auction of Spectrum in 800 MHz Band.

In this regard, please find enclosed our response for your kind perusal.

We hope our views and submissions will merit the kind consideration and support of the Authority.

Kind regards,

Rajan S Mathews
Director General

**Distribution : Dr. Rahul Khullar, Chairman, TRAI
: Shri. R. K. Arnold, Member, TRAI
: Smt. Vijayalakshmy K. Gupta, Member, TRAI
: Shri. Rajeev Agrawal, Secretary, TRAI
: Shri. N. Parameswaran, Pr. Advisor (B&CS), TRAI
: Shri. Sudhir Gupta, Pr. Advisor (NSL), TRAI
: Smt. Anuradha Mitra, Pr. Advisor (FA & EA), TRAI
: Shri Arvind Kumar, Advisor (NSL), TRAI**



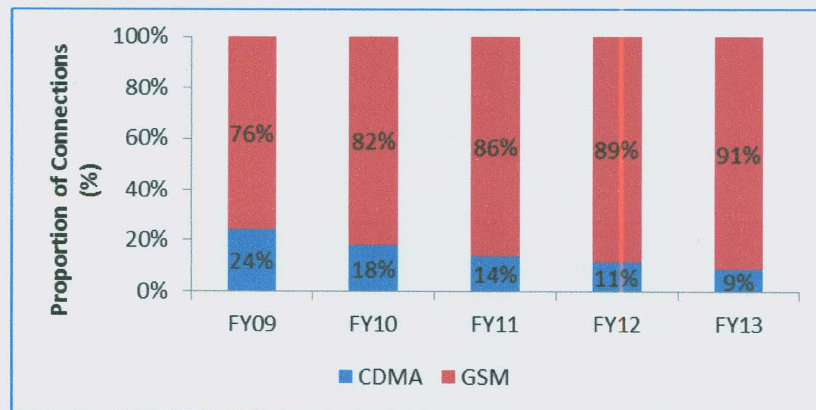
**COAI comments on TRAI Consultation Paper
on
RESERVE PRICE FOR AUCTION OF SPECTRUM IN 800 MHZ BAND
Released on December 30, 2013**

BACKGROUND

1. COAI has made several representations to the Government and also a detailed representation to the TRAI vide its response RSM/COAI/2013/149 dated August 14, 2013 to TRAI Consultation Paper on 'Valuation and Reserve price of Spectrum' to reconfigure the existing 800 MHz band and offer it as E-GSM /E-900 MHz as:
 - a. It will result in far more efficient utilization of spectrum in the 800 MHz band.
 - b. This spectrum will be used for growth of broadband and will maximize overall revenue for the Exchequer in the long run.
 - c. This would also be in line with international practices.

2. TRAI, in its recommendations on Spectrum Valuation and Reserve Price of 1800 MHz and 900 MHz, has itself acknowledged the diminishing interest in CDMA and the fact that the revenues, minutes of usage and the subscriber count of CDMA operators are continuously declining over the last few years. Further, in the auction held in November 2012, there was no bidder for spectrum in the 800 MHz band and only one TSP bought spectrum in March 2013 auction.

Chart 1: Proportion of GSM and CDMA subscriber connections



Source: TRAI

