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November 20, 2009

TRAI Chairman,
Mahanagar Doorsanchar Bhawan,
Jawaharlal Nehra Marg,
New Delhi 110 002

Sub. : TRAI Consultation Paper on "Overall Spectrum Management and Review of License Terms and Conditions"

Dear Sir,

This is with reference to the above consultation paper, please find below my response on certain critical issues:-

1. Uniform Spectrum Charges : The present spectrum charging methodologies gives an arbitrage opportunities as the spectrum charges vary from one technology to another technology. Under a single license agreement, the telecom operator is paying different spectrum charges for different technologies.

As per my view, the opportunities may arise wherein one operator indulge themselves for diversion of the revenue in such a manner, which enables them to pay lower spectrum charges. In order to dismantle the possibilities of revenue leakage and to protect the Government's payouts, the annual spectrum charges should be technology neutral and a uniform spectrum charges should be considered at the earliest.

A uniform spectrum charge would be a futuristic approach as under the same licence agreement, the operator would be using numerous technologies like GSM, CDMA, 3G, BWA, 800MHz etc. etc.

2. Review the Spectrum Allocation Criterion : The current spectrum allocation criterion is highly biased and gives ample opportunities to misuse at the cost of state exchequer. The country should not lose its sight over the ample revenue opportunities and the best way to achieve market determined prices is via open and transparent auctions. This would ensure that the dues to the state exchequer from a national resource are not wasted and go towards enriching few companies.

Auction is a time tested spectrum allocation approach, which has been followed by various countries and among all spectrum allocation approaches, it is considered the best. Thus, the Regulator should recommend the auction approach for all future 2G spectrum, as earlier recommended for 3G spectrum.

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I am sure that any policy change will bring certain objections from the affected parties; however, the same should not stop the Regulator to change the policy especially when the same is good for the society and enable the country to realize the economic value of the spectrum.

In view of the above, I request your goodself to follow a uniform spectrum charge as well as auction approach for all future 2G spectrum for the entire telecom industry so that the state exchequer is not at any disadvantage position and is able to get its legitimate revenues/dues.

You please treat my letter as a response to your consultation paper.

Thanking you,

Very truly yours,

A handwritten signature in blue ink, consisting of a large loop followed by a smaller loop and a long horizontal stroke extending to the right.

(Jagannath Manda)