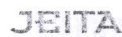


CMAI INTERNATIONAL MOU PARTNERS



Cambridge



## N K Goyal

Mobile: +91 98 111 29879,

Email: [nkgoyals@nkgoyals.com](mailto:nkgoyals@nkgoyals.com), [president\\_cmai.asia](mailto:president_cmai.asia),

Website: [www.cmai.org.in](http://www.cmai.org.in)

February 15, 2012

Shri J. S. Sarma  
Chairman  
Telecom Regulatory Authority of India  
Mahanagar Doorsanchar Bhavan  
Jawahar Lal Nehru Marg  
New Delhi 110 002

*For Delhi (MS)*

**Sub: Comments for consideration of TRAI on "Allocation of Spectrum in 2G band in 22 Service Areas by auction"**

Dear Sir,

On behalf of CMAI Association of India, we would like to make the following comments for your consideration on the pre-consultation paper on allocation of spectrum in 2G band in 22 service areas by auction:

1. The auction should be open for all including global players who do not have presence in India through its potential Indian partner except existing licensees. Certain eligibility criteria should be provided for global player such as experience of operating similar services for 5 years, subscriber base of 50 million and net worth of USD 2 billion.
2. All licenses which have been quashed pursuant to the Hon'ble Supreme Court Judgment of February 2, 2012 should be eligible for the slated auction and unified access license/unified license.
3. The reserve price should be fixed at the level of auction price of the fourth cellular license at Rs. 1659 crores which was deemed to be the value of the 4.4 MHz/2.5 MHz spectrum discovered by the market through an auction as a fair reserve price.
4. Licenses cancelled as per the recent Hon'ble Supreme Court's Judgment of February 2, 2012, should be allowed a set off for the already paid entry fees of Rs. 1,659 Crores pan India or part thereof in the upcoming auction.
5. Existing incumbent operators already holding initial start up spectrum greater than or equal to 4.4 MHz GSM/2.5 MHz CDMA and whose licenses come up for renewal in 2014/2015/2016/2018 should not be allowed to participate in this auction.
6. Auction format should be such that the auction is concluded before the Hon'ble Supreme Court's Judgment comes into force i.e; 4 months / before 1st of June 2012.

प्रधान सलाहकार (स.स.)  
डायरी सं. 128  
14/2/12



