

**TRAI: Pre-Consultation Paper No. 21/2019**

**Your Ref:** Pre-Consultation Paper on Enabling Unbundling of Different Layers Through Differential Licensing, 9th December 2019

**Date:** 27<sup>th</sup> January 2020

**To**

Shri Syed Tausif Abbas, Advisor (Networks, Spectrum and Licensing),  
Telecom Regulatory Authority of India, New Delhi, India

**Sub:** Comments on Pre-Consultation paper No. 21/2019 – Regarding

*Sending through E-mail: [advmn@traigov.in](mailto:advmn@traigov.in)*

Dear Sir,

Please consider following on the subject noted above - Regarding

**W.r.t Q3:**

At present, the telecom sector is running in huge bank loans and viability of business itself becomes a big question. It is suspense, whether at least 3 private TSPs exist in our nation by the end of this financial year. **This is not the right time to release this pre-consultation paper.**

However, **W.r.t Q.4:**

1. Delivery of telecom services in Rural/Remote/Difficult terrain area in line with Urban.
2. Last mile convergence
3. National alternate back-haul/back-bone
4. International practices should be taken from countries viz.,
  - China (in size, usage & Population)
  - USA (in size, usage & political environment i.e. democracy)

Compare, how much spectrum each TSP having in such larger countries against their tele-density.

5. Centralized/decentralized active telecom equipments are to be minimized to reduce imports.
6. Our Nation scenario is in between China & USA, therefore, 100% Government or 100% private is not viable. (Example: look at the parameter “Delay of Justice”, etc.). Accordingly to be considered.
7. Determine the maximum & minimum number of Licensees (Government + Private)

Contd. From Pre-page:

8. Introduce “**Guarantee period for spectrum**”. This can be understood by the following example:

- TSP-A purchased 3G spectrum in 2010 and started operations in 2012 with an expectation of Return on investment (ROI) in at least in next 10 years. In the mean time, i.e. during 2015, 4G picked-up on other band of spectrum. Now customers are migrating to 4G services provided by TSP-B. To compete in the market & meet customer expectations, TSP-A have to invest to acquire 4G-spectrum & network.  
i.e. Before getting return-on investment on 3G spectrum/network, TSP-A needs to invest again on 4G, and after few years again to invest on 5G.

Here the question is.....Is the business of TSP-A viable?

Therefore, when-ever technology changes from 2G to 3G, 3G to 4G, or 4G to 5G, TSP-A should not spend again and again on acquiring spectrum. This TSP-A should be given a “**Guarantee period**” of **20 years for spectrum**, during this period, TSP-A can shift to any forthcoming technology with-out investing on spectrum.

9. Licensee/TSP should deliver services in all areas irrespective of Rural/Urban/Remote/difficult terrines/Roads. There should be Model services delivery/coverage manual for each type of TSP/ licensee—any reduction of actual coverage/service delivery by the TSP/licensee, that TSP/licence should be penalized.
10. Fixing National Standards to encourage our National Innovation/manufacturing
11. Suppliers, OEMs, etc. (from various countries) should take-back the “life expired/outdated telecom equipments” to their countries. Our nation should not be dust-bin of such electronic waste.
12. Combine all multiple LSAs in to **one National LSA**. There should be **One National Licence** across Nation. I.e **One Nation One Licence**.