

VNO/REG/TRAI/F-002/2104**Date:- 05.04.2024**

To
The Advisor- NSL
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawaharlal Nehru Marg
Old Minto Road
New Delhi 110002

Subject:- Counter comments on TRAI consultation paper on “Connectivity to Access services VNO’s from more than one NSO”.

Dear Sir,

With reference to the TRAI consultation paper on “**Connectivity to Access Service for VNOs from more than one NSO**”. It is humbly submitted on behalf of the UL-VNO Access Service License holders which are members of the VNOAI and are not able to start the Mobile services as no NSO in India is ready to provide the network access to the VNOs. It clearly shows there is a market failure as since last 8 years no MVNO could start its services in India.

1. TRAI needs to comprehensively examine how Globally the MVNO are flourishing day be day and consumers are getting benefited as they have got choice of niche services as per their requirements.
2. The issues highlighted for wireless single parenting has got huge challenges due to which even after 8 years of DOT UL-VNO Licensing Guidelines no VNO could start its Mobile services with any of the present TSPs(NSO). Many of the TSPs have responded in the CP that there is no incentive for current TSPs to become NSO of any VNO for the wireless (MVNO) services.
3. As the VNOs are not able to start Mobile services with single parent thus thinking of dual parenting for wireline services is not desirable.
4. **VNOAI having couple of Global MVNO operating successfully in various geographies in all the continents can assist the authority to evaluate the technical feasibility and the intricacies involved in allowing Multiparenting for**



wireless-wireless and wireless and wireline. It will help authority to evaluate all the technical and operational challenges after seeing practical scenarios in Multiparenting in any technology. Moreover it will help the VNOs to take informed decisions for adoption of multiparenting. Otherwise theoretical assumptions does not augur well when the VNOs spend huge money to start the services but they fail in view of practical operational challenges they face to start the services as per the recommendations.

- Thus VNOAI after going through the comments of all the stake holders come to the conclusion that there is an urgent need to reexamine whole of the VNO wireless single parenting issue based upon the experience of last 8 years of VNO regime. Also in case there is a need to incentivize the sector then authority consider all the options to make VNO Mobile sector take off.
- Detailed separate consultations can be done with all the stake holders based upon the experience of last 8 years of VNO regime to make the India telecom sector really competitive for the benefit of consumers.
- VNOAI support the view of some of the stake holders in the current CP that there is need to incentivize NSOs during spectrum sale or otherwise to parent the VNOs to augur the market by offering innovative services in 4G/5G technologies for the overall health of the sector.

Thanking you,

For VIRTUAL NETWORK OPERATORS ASSOCIATION OF INDIA

(RAKEH KUMAR MEHTA)

SECRETARY GENERAL

C.C.1. The Chairman, TRAI- New Delhi.
2. Secretary (TRAI), New Delhi

