



29th August 2013

Mr. Arvind Kumar,
Advisor (NSL),
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg (Old Minto road),
New Delhi-110002

Subject: Permitting Trading of Spectrum in India.

Dear Sir,

This has the reference to TRAI press release no 63/2013 dated 23rd August 2013 on permitting trading of spectrum in India. In this regard, we wish to inform you that we have already provided our inputs to the Authority as part of our comments to Consultation Paper dated 23rd July 2013 on '**Valuation and Reserve Price of Spectrum**' on 14th August 2013.

We would like to reiterate once again that in today's context where we have a mix of both allocated and auction purchased spectrum, spectrum trading on any scale will only lead to speculation and distortion in distribution of spectrum. This is further aggravated by the fact that operators don't hold comparable spectrum leading to a non-level playing field. **Any large scale spectrum trading at this point will only further distort the level playing field and is not recommended.**

We therefore recommend that the spectrum trading should be limited to return of unwanted spectrum bought at market prices to DoT by an operator or sold on a bilateral negotiated basis to a prospective buyer. Free trading as in an exchange with the ability of speculators to "hold" spectrum, etc should be brought in only when market forces have been clearly established and all operators are competing on a more comparable footing.

We hope that our views on spectrum trading will be given due cognizance by the Authority.

Thanking you and assuring you of our best attention always.

Yours sincerely,

Anand Dalal
Senior Vice President – Corporate Regulatory Affairs
Tata Teleservices Limited
And
Authorized Signatory
For Tata Teleservices (Maharashtra) Limited

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