

TRAI CONSULTATION PAPER ON SPECTRUM RELATED ISSUES

COMMENTS ON ISSUES FOR CONSULTATION

1. CHAPTER 2: CURRENT SPECTRUM AVAILABILITY AND REQUIREMENT

- (i) The 450 MHz band should be utilized for services in rural areas.
- (ii) The ITU method is recommended for assessment of overall requirement. It is not suitable for calculating individual needs.
- (iii) The question is too premature.
- (iv) The IMT 2000 spectrum must not be considered as extension of the 2G mobile services. Instead it must be considered separately as is the accepted practice in other countries.
- (v) It is very desirable that every operator has a contiguous frequency band.
- (vi) The band 1800-1900 should be limited to TDD operators.

2. CHAPTER 3: TECHNICAL EFFICIENCY OF SPECTRUM UTILIZATION.

- (vii) At present no technology may be preferred over another.
- (viii) Data services are being provided already.

3. CHAPTER 4: SPECTRUM PRICING

- (ix) Present revenue sharing methodology must continue; however the ratios may be changed as required.
- (x) Not Applicable.
- (xi) Not Applicable
- (xii) AIP is not recommended.
- (xiii) Not Applicable
- (xiv) Not Applicable
- (xv) Not Applicable
- (xvi) Not Applicable
- (xvii) Not Applicable

4. CHAPTER 5: SPECTRUM ALLOCATION

- (xviii) There is no need to change the present policy.
- (xix) All present operators **MUST BE GIVEN PREFERENCE.**
- (xx) The spectrum must be allocated to serve the needs.
- (xxi) The present criteria must continue.
- (xxii) The present criteria must continue.
- (xxiii) He present criteria must continue.
- (xxiv) The fourth CMSP may be allocated spectrum in the 900 MHz band only if such spectrum is available in the specific town or area etc.
- (xxv) The IMT 2000 must be kept separate and must not be polluted / shared / mixed with present services.
- (xxvi) Not Applicable.

5. CHAPTER 6: RE-FARMING, SPECTRUM TRADING, M & A AND SURRENDER

RE-FARMING OF SPECTRUM

- (xxvii) It should be got vacated as soon as possible.

(xxviii) The question is premature for the present.

SURRENDER OF SPECTRUM

(xxix) Since the spectrum was “not funded” by the operators, there is no question of refund.

(xxx) Not Applicable,

(xxxi) Not Applicable.

SPECTRUM TRADING

(xxxii) The spectrum market should not be opened for trading between operators.

(xxxiii) Not Applicable.

MERGERS & ACQUISITIONS

(xxxiv) No general decision may be taken in this respect.

(xxxv) The IMT 2000 and 2G services must be separate and distinct entities.

(xxxvi) Decision may be based on actual service requirements.