

## **BHIWANI COMMUNICATIONS PVT. LTD.**

Regd. Office : 59, Improvement Trust Market, Bhiwani-127021 (Haryana)  
Corporate Office : 59, Improvement Trust Market, Bhiwani-127021 (Haryana)  
PSTN - 01664-243555, GSM - 098965-44555, URL - [www.link4data.com](http://www.link4data.com)

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**Dated: 24-02-2012**

To

Shri Sudhir Gupta, Pr. Advisor (MS),  
Telecom Regulatory Authority of India,  
Mahanagar Doorsanchar Bhawan,  
(Next of Zakir Hassain College)  
Jawaharlal Nehru Marg,  
(Old Minto Road)  
New Delhi-110002

**Sub. : Consultation Paper No 01/2012 dt 16<sup>th</sup> Jan 2012,**

**Comments on consultation on Draft Guidelines for Unified Licence/Class**

**Licence and Migration of Existing Licences.**

ISP License No. 820-894/06- LR dated 26-04-2006,

**Registration No:- S/IS/HR/C/000439**

Respected Sir,

As per the guidelines by the honourable authority we have some comments on above mention subject.

1. We think that there is no need of unified licence for existing licence holder. If a telecom service provider want to add new services he may choose the specific one in the existing licence regime but in the unified licence regime licensee will have to pay unwillingly for those services which are not the target services for licensee. There may be new entrants for unified licence willing to work in all field but the existing one should not be bounded for the same. If the existing one want to work in more than two field they may be treated as new entrants

2. A holder of Unified Licence (restricted) shall have the option to apply for and migrate to a Unified Licence (restricted) through existing condition.

3. In the event a holder of Unified Licence (restricted) desires to Expand the service area(s) of operations with the same services only, and want to migrate to Unified Licence (restricted), such type of migration should be allowed without prescribed entry fee.

4. If an ISP (Category B) takes unified licence in a district where he is working as an isp Unified Licence (restricted), than in that distt it will be a unified licence or Unified Licence (restricted).

5. To encourage infrastructure provider-I all registered IP-I provider should be migrate to Unified Licence (restricted) without any entry fee.

6. Special incentive should be given to ISP (Category C), so that they should not remain backward in the chain.

Thanking you.

Yours faithfully

Sandeep kumar Bhardwaj  
For Bhiwani Communications Pvt. Ltd.  
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