

Comments on Consultation Paper

Consultation Paper No. 4 / 2017 dtd. 20 March 2017

Introduction of UL (VNO) for Access Service authorization for Category B license with districts of a State as a Service Area

1. Is there any need to introduce Cat –B VNOs in the sector?

Yes, an introduction of CAT B UL (VNO) Access Service License for Districts as Service Area in the sector will be much needed shot in the arm in providing for competitive services, innovative applications and greater reach in Access Services. This will also permit smaller players including SMEs to start small with services and scale to circle and further licensing on achieving growth.

Q4. What should be Networth, Equity, Entry Fee, PBG, FBG etc. for District level UL (VNO) Cat.-B licensee in case these are allowed for Wireline and Internet services only? Answer with justification.

Already businesses have a lot of investments sunk while setting up services. Entry Fee should be kept at minimal levels permitting more players to enter without the necessity of greatly leveraging themselves. Necessary values of Networth, Equity, PBG and FBG should be adequater markers to permit entry of only serious players.

Q9. Based on the business and operational requirements as discussed in Para. 21 above, should UL (VNO) Cat. 'B' licensees be permitted to enter into agreement to hire telecom resources from more than one TSP in its area of operation for providing voice and internet services through wireline network?

Yes. In the case of one TSP only, significant bargaining powers will reside with TSP only, which can lead to deterioration in services. UL (VNO) Cat B and even other licensees should be permitted to enter into agreements with one or more TSPs to permit a competitive business environment. This will significantly open up the VNO Access Services sector. Necessary safeguards may be built in.

Yours truly,

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1st May, 2017, Vadodara