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To  
Team, TRAI, New Delhi

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**Sub:** Counter Comments on Consultation paper on Enabling Unbundling of Different Layers through Differential Licensing,

**A) Authorities/Stakeholders are missing the following:**

- Number of Network Service Providers (NSP) required in Nation?
- Let Service delivery operators/VNOs = S, number of NSPs= N. Check if  $N > S$
- What is the licensed Geographical area for a Network Service Provider?
- Check the scenario where no NSP present in a LSA or in few LSAs?
- For example: A NSP establishes perfect telecom resources for 4G services across India through investing a lot (to acquire spectrum, switches, media, towers, etc). But by the time of launching or with in short time, if 4G is absolute, what happens to that NSP? (Similar situation happened in case of 3G among various TSPs in India because of 4G)
- Regularity Measures that to encourage development / manufacturing of indigenous technology/telecom systems as per ANB (Aatma Nirbhar Bharat) through this new business model but not a business opportunity to other Nations. (Example: Huge import of set-top boxes at the time of Digitalization of cable TV operations)
- NSP business model reduces multiple technological infrastructures.

**B) Being BBNL (Bharat Broad Band Network Limited) is the first Network Service Provider in India;** their experiences/inputs are very helpful for further expanding the model. It seems BBNL not participating in this discussion.

Best Wishes to Team TRAI & all Stake holders

SSVas