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Advisor (Networks, Spectrum and Licensing)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg, Old Minto Road
New Delhi-110002

Subject : Vodafone Idea's Response to Consultation Paper on Reforming the Guidelines for Transfer/Merger of Telecom Licenses dated 19th September 2019
Reference : Consultation Paper on Reforming the Guidelines for Transfer/Merger of Telecom Licenses dated 19th September 2019

Dear Sir,

This is in reference to the consultation issued by the Authority.

Please find enclosed our response to the issues raised in the consultation paper on "Reforming the Guidelines for Transfer/Merger of Telecom Licenses" as Annexure A.

Kindly note that our comments are only with respect to the simplification and fast-tracking of the current process involved in the Transfer/Merger of Telecom Licenses.

Thanking you

Yours faithfully,
For **Vodafone Idea Limited**



P Balaji
Chief Regulatory & Corporate Affairs Officer

Encl: as above.

Vodafone Idea's Response to the TRAI Consultation Paper on Reforming the Guidelines for Transfer/Merger of Telecom Licenses dated 19th September 2019

Q1. What reforms are required to be made in the existing guidelines on Transfer/Merger of Licenses to enable simplification and fast tracking of approvals? Kindly provide clause-wise response along with detailed justification.

VIL Response:

We are limiting our response to fast-tracking of approvals and not commenting on various issues relating to current M&A guidelines which are sub-judice.

For the purpose of fast-tracking of the current process, it is of utmost importance that no separate approval should be required from Licensor after the Transfer /Merger of the licenses is sanctioned by Tribunal/Company Judge:

- a) DoT vide its Amendment dated 24.09.2018 in the Guidelines for Transfer/Merger of various categories of Telecommunication service licenses/authorisation under Unified License (UL) on Compromises, arrangements and amalgamation of the companies dated 20.02.2014, added a point in Clause 3 (a) that

After the scheme is sanctioned by the Tribunal/Company Judge, the Licensor will provide its written approval within 30 days of receipt of request for approval to the transfer/merger of licenses/authorizations under Unified License.

- b) Further, when proposal for Transfer/Merger is filed before the Tribunal or the Company Judge, the licensor is notified and representation/ objection, if any, by the Licensor on such scheme on the merger/transfer of licenses/authorizations under Unified License, have to be made and informed to all concerned within 30 days of receipt of such notice.
- c) In this regard, we would like to submit that if there is no representation or objection received from the licensor and the scheme is sanctioned by Tribunal/Company Judge, there should not be any requirement for further approval from the licensor.
- d) We believe that the above-highlighted suggestion will enable simplification and fast track the approval process. Thus, accordingly, we request that the procedure of getting approval from the licensor after the scheme is sanctioned by Tribunal/Company Judge should be reviewed.

Q2. Whether mandatory access to MVNOs should be provisioned in the DoT M&A Guidelines to address the competition concerns? If yes, in which cases the access should be mandated and what should be the guiding principles for provision of wholesale access to MVNOs? If no, kindly provide justification.

VIL Response:

We are of the view that there should not be any mandatory access to MVNOs that needs to be provisioned in the DoT M & A Guidelines. In case any change in the UL (VNO) Guidelines are envisaged then there should be a separate detailed Consultation, as this issue has a major Policy/Regulatory impact on the Telecom Sector.

Q3. In your view, what changes are required in the provisions of UL so as to make them unambiguous? Please provide justification.

VIL Response:

No further Comments.

Q4. If there are any other issues / suggestions relevant to the subject, stakeholders may submit the same with proper explanation and justification.

VIL Response:

We are limiting our response to the process of simplification and fast-tracking of approvals and not commenting on various issues relating to current M&A guidelines which are presently sub-judice.
