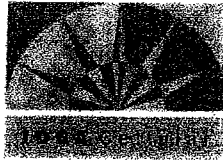


ADITYA BIRLA



Himanshu Kapania
Managing Director

15th February 2012

The Secretary,
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg (Old Minto Road),
New Delhi-110002

Kind Attn: Principal Advisor (MS)

Dear Sir,

Sub: Pre consultation on "Allocation of License & Spectrum in 1800/800 MHz band in 22 Service Areas by auction"

Refer above subject, at the outset, we would like to submit the following :

- A. Idea Cellular Limited is a pioneering Telecom Operator with mobile services being offered across the country comprising of 15 Service Areas for which license were issued before January 2008 and 7 New Service Areas for which license issued in January 2008.
- B. Idea Cellular Limited has need for 900 MHz/1800 MHz spectrum in both its 15 Existing Service Areas for capacity expansion as per the existing Government policy under 'Subscriber linked criteria' (our several applications are pending with DoT) and in the 7 New Service Areas arising due to proposed quashing of licenses due to recent Supreme Court Judgment dated 2nd February 2012.
- C. The Authority is fully aware of the circumstances under which a pioneering serious mobile operator like Idea Cellular Limited stands deprived of its seven operative licenses viz. Tamil Nadu (including Chennai), Kolkata, West Bengal, North East, Assam, Orissa & J&K service areas. Idea's applications for license were first in every respect as far back as June 2006, but were treated unfairly by changes in Government policy – which Idea itself protested against since October 2007.

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Himanshu Kapania
Managing Director

- D. Our unique situation has been clearly recorded by the Hon'ble Supreme Court in its Judgment dated 2nd February 2012. However, since the Court has quashed the press release of 10th January 2008, our seven operative licenses, two overlapping non-operative licenses of Idea Cellular Ltd (Karnataka & Punjab) and four overlapping non-operative licenses of erstwhile Spice Communications Ltd (subsequently merged with Idea Cellular Limited) (Maharashtra, AP, Delhi and Haryana) are impacted. Our situation is evident from para 30 of the Judgment, which is extracted below :

"It is borne out from the record that Vodafone Essar Spacetel Ltd. (respondent No.12) had made an application for UAS Licence in 204 and 3 others, namely, Idea Cellular Ltd. (respondent No.8), Tata Teleservices Ltd. (respondent No.9) and M/s. Aircel Ltd. (respondent No.11) had made similar applications in 2006. However, the same were not disposed of by the DoT and they were included in the figure of 167."

- E. Idea had applied for grant of licence in June 2006 and therefore should not have been clubbed with later applicants of 2007. If the Government had adhered to the Clause 23 of the UASL Guidelines of 14th December 2005, as regards issue Letter of Intent within 30 days, if the applicant is eligible, which clearly was the case here, our licenses would have been granted much earlier. Our submissions to this effect are recorded in para 56 of the Judgment, which is extracted below:

"56. Shri C.S. Vaidyanathan, learned senior counsel appearing for respondent no. 8 argued that the application made by his client was pending since June, 2006 and by application of the distorted version of the principle of first-come-first-serve, its priority was pushed down. Shri Vaidyanathan pointed out that when the Minister of C&IT announced that applications will not be received after 1.10.2007, there was a huge rush of applications and a large number of players who had no experience in the field of telecom made applications and got the licences."

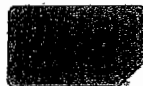
- F. We had periodically reminded the Government of our pending applications and had vehemently protested when the 10th January 2008 policy was announced. The extract from our letter to the DoT Secretary articulates our stand.

"...it is strange that our 9 Letters of Intent were finally issued on 10 Jan, 2008, and that together with scores of other applicants, none of whom were eligible on 26 June 2006 and in most cases are very recent applications compared to our 19 months old applications. This is lip service to the principle of first come first serve, and has the effect of equalizing of unequals."

- G. The Authority is also fully aware that Idea was the only service provider who not only fully completed its roll-out obligations (coverage much beyond 50% & not just 10%), in the 7 New Service Areas and therefore, is unnecessarily caught in this situation of cancelled licenses, as the licenses were granted in January 2008 which was as late as 18/19 months from the date of application. Idea Cellular Ltd had separately registered its protest with the Government on the process followed for allocation of licenses in 2008 and subsequently in the TDSAT.

- H. The Authority is also aware about issues surrounding the overlapping licenses (arising out of Idea Spice merger) and the fact that the same were strictly kept non-operational in the spirit of the telecom policy.

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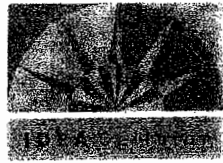


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Himanshu Kapania
Managing Director

- I. Status of our roll-out obligations in the seven operating service areas (recently submitted by us to TRAI) is enclosed for reference as Annexure A.
- J. The Authority would also note that since the grant of licenses in 2008, as on date, Idea has invested more than Rs.3500 crores in seven operating licenses of Tamil Nadu (incl. Chennai), Kolkata, West Bengal, Orissa, North East, Assam & J&K. This is exclusive of entry fee of approx. Rs 326 crores paid for seven operating licenses & Rs 843 crores paid for six non-operative licenses (including erstwhile Spice Communications Ltd). Naturally, since we are running full operations, the investment continues to rise and the uncertainty created due to cancellation of licenses is unnerving our investors, customers and employees.
- K. We have a subscriber base of more than 6 million in these seven New Service Areas and these subscribers continue to enjoy 24x7 affordable most competitive services. Authority needs to ensure that all its proposed recommendations should provide ample opportunities for protection of investments, customers, employees, channel partners, choice for society and continuity of operations.

While we are taking all necessary steps to protect our investments, we however, urge the Authority to remove the uncertainty in the market place/ customers by expediting the auction structure, schedule and time frame at the earliest.

Keeping in view the above background, we reserve our right to any remedies that are available to us to the extent we have been adversely impacted by imminent cancellation of licenses including but not limited to a claim for refund of entry fee, claim for compensation for amounts invested by us in running the operations in the seven operating service areas and the claims which the company will be required to honour in case of cessation of services.

Without prejudice to the aforesaid rights, we provide our suggestions in response to your pre-consultation on auction of spectrum as under -

1. Auction the Total available 1800/800 MHz Spectrum band (including balance available with DoT)

- The proposed quashing of licenses as per Supreme Court Judgment on 2nd February 2012 (herein after referred to as 'Quashed Licenses') has lead to availability of start-up 1800/800 MHz spectrum with the Government across all 22 Service Areas (Circles) within the country.
- We also understand, Government has additional/balance 1800/800 MHz spectrum available in number of Service Areas. Please refer to Annexure VI of TRAI recommendations on Spectrum management & licensing framework dated 11th May 2010 and also refer to WPC website link <http://210.212.79.13/Static/spectrumallotement.html> which clearly highlights the availability of spectrum across various service areas.
- We recommend the total spectrum available with the Government be auctioned for all participating eligible Telecom Service providers including spectrum available fro holders of 'Quashed Licenses' and balance available with the DoT/WPC.

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Himanshu Kapania
Managing Director

- No artificial scarcity should be created, which will prevent the discovery of right market value.

2. Open 1800/800 MHz Auction to all Eligible Telecom Providers

We recommend that 1800/800 MHz Auction be opened to

- All holders of 'Quashed Licenses'.
- All New applicants who become eligible for new UASL licenses on currently specified terms and conditions.
- Existing Telecom Service Providers in respective service Areas.
- The suggestion of auction opened for eligible telecom operators is based on the assumption that all available spectrum as detailed in point 1 above is included in the auction.

3. Ensure Efficient Allocation of spectrum – Prevent hoarding /garnering large block of spectrum

To ensure that no individual Telecom Service Provider can block /hoard large block of spectrum and keep it idle/underutilised, we recommend the following norms be specified as upper allocation for all participants in the 1800 /800 MHz Auction.

- Holders of 'Quashed Licenses' and New eligible applicants
 - Start up spectrum be limited to (4.4 + 4.4) MHz in 1800 MHz and 2.5 MHz in 800 MHz
 - 6.2 MHz in 1800 MHz, if the licensee has reached the defined 'Subscriber Linked Criteria' and met all the roll-out obligations.
- Existing operator in a specified Service Area can acquire up to a maximum limit as applicable under the 'Subscriber Linked Criteria' (as per Government Order dated 17th January 2008), if its application for same is approved by DoT before the finalisation of Auction.
- Maximum spectrum cap for all existing Telecom Service Provider in a specified Service Area as per existing applicable Government policy.
- While New application /holders of 'Quashed Licenses' can bid in a single block of 4.4 MHz, we recommend incumbent operators can bid in blocks of 1 MHz with upper cap to the 'Subscriber Linked Criteria' and/or Maximum Spectrum cap whichever is lower.

4. Reserve Price for 1800 MHz Auction

- The last Market driven Auction Price was discovered in 2001. The Department of Telecom has allocated spectrum to existing GSM /CDMA operators as late as 2007/08 at the same 2001 Market discovered Auction price for GSM @ Rs. 1658 cr for the All India License.

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Himanshu Kapania
Managing Director

- The maximum spectrum available for this Auction is from Telecom Service Provider who were allocated licenses in January 2008 with a clear contractual understanding of Spectrum Pricing @ Rs. 1658 cr for a nationwide 1800 MHz contracted spectrum of 6.2 MHz.
- So, if reserve price is set at any different level to existing price discovered for 1800 MHz of Rs. 1658 cr, then it will not meet the objective of 'equality' and 'level playing field' for all participants.
- As the reserve price is the starting benchmark for participants to bid and final price discovered will be through auction based on demand supply interplay, we strongly recommend reserve price for new 1800 MHz Spectrum Auction be kept at similar level for each Service Areas as discovered during 2001 1800 MHz 4th License Auction.
- Recommend Reserve Price of Rs. 1658 cr for a period of 20 years, 6.2 MHz spectrum for All India Service Areas. Reserve Price for individual Service Areas be same as prevailing in 2007/2008 allocation.

5. Award of New license to companies holding 'Quashed Licenses' and new applicants

- We understand from media reports, Government is in the process of finalising new licensing norms, delinking license from spectrum and announcing new norms for Unified Licenses. However, completion of finalisation of Policy for Unified license may be within the ambit of the proposed overall NTP 2012. We also believe final guidelines for Unified licenses may take its normal course of time.
- But, due to emergent situation arising out of Supreme Court Order dated 2nd February 2012, licenses are being proposed to be quashed after 4 months and the Auction process has to be completed well within the 4-month period, so that the linked licensees' investments, customers, employees, channel partners, etc., are protected.
- Therefore, we recommend just like in the case of 3G Auction case, all eligible operators whose licenses are proposed to be quashed due to the Supreme Court Order may bid separately for the 1800/800 MHz spectrum and should automatically qualify for 'UASL' license.
- Should the Government plan to introduce guidelines for migration of all Cellular Mobile Service Providers (CMPS), NLD, ISP & UASL providers to a New Unified Licensing Regime – the same can be applicable for winners of the new 1800/800 MHz spectrum auctioned in 2012, issued new UASL licenses.
- We recommend delink 1800/800 MHz Auction Process from the planned new Unified Guidelines and issue UASL license to all successful bidders – holders of 'Quashed Licenses' and new applicants.

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Himanshu Kapania
Managing Director

6. Auction Process

The Government managed a hugely successful 3G & BWA Auction in 2010. The experience garnered from that should position the DoT to manage the process in the shortest period of time.

7. Auction Terms – License & Spectrum

It is recommended that 1800/800 MHz spectrum contract should be -

- As large investment have to be committed, the award of spectrum and license should be for a minimum period of 20 years from the date of award.
- The use of spectrum should be technology agnostic, and the choice of technology should be left to the operator.
- All existing terms and conditions of UASL license which came bundled with start-up spectrum should be applicable to successful bidders in the auction who do not already hold a license for the given Service Area.

8. Frequency Band Allocation

As a large portion of the 1800 MHz spectrum is to be released by holder of licenses which are proposed to be quashed, but a number of these operating companies have rolled out the services and some of these licensee have met the defined roll-out obligation. In case these companies were to win the spectrum back in a market determined Auction Process, the Government should allocate the same band of frequency to the affected license holder whose licenses were quashed by the Supreme Court.

This 'first right' to the specific frequency band may be earmarked by the Authority for the holder of 'Quashed Licenses', as these companies had made large investments with a number of radio equipments specially tuned to the specific spectrum and frequency band allocated earlier.

9. Linkage of 1800 MHz Auction Price Discovery to Renewal of licenses from 2014 onwards

- No. of existing incumbent mobile operators including Idea were winner of license Auction in 1995 /1996. A number of licenses of the incumbent operators are now due for renewal in 2014/2015.
- The renewal price for these licenses has to be discovered. The new 1800/800 MHz Auction gives an excellent opportunity for price discovery to be applied for renewal of licenses.
- It is proposed that the Renewal price of licenses from 2014 onwards be linked to the price Government discovers in this 1800/800 MHz Auction. This suggestion is based on the assumption that the entire available spectrum as detailed in point 1 will be auctioned.

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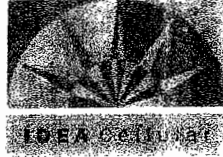
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ADITYA BIRLA



Himanshu Kapania
Managing Director

10. Adjustment of License Fee from Auction Amount

- The earlier paid Entry Fee needs to be adjusted from the final Auction Amount for the holders of 'Quashed Licenses'.

Lastly, we also feel that it would be proper for the Authority to clarify the objectives of the auction in terms of price discovery achieved through this auction process – impact on issues surrounding pricing of spectrum.

We are confident that the suggestions and comments given by us will be considered sympathetically by TRAI as Idea Cellular Limited is adversely impacted due to the Supreme Court order inspite being an applicant in 2006. Further, we reserve our rights for wider submissions on this subject at the consultation stage. Our views on the above are without prejudice to all our other rights.

Thanking you,

Yours faithfully,
For Idea Cellular Limited

Himanshu Kapania
Himanshu Kapania
Managing Director

Encl : Annexure A



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ADITYA BIRLA



IDEA Cellular

December 09, 2011

Senior Research Officer (MN)
 Telecom Regulatory Authority of India
 Mahanagar Doorsanchar Bhawan
 J.L. Nehru Marg, New Delhi – 110002

Subject: Compliance to terms and conditions of License Agreement pertaining to Rollout Obligations.

Ref: Your Letter no. 102-5/2011-MN (Pt.) dated 25th November 2011.

Dear Madam

This has reference to your above mentioned letters addressed to Idea & Spice respectively, regarding submission of rollout data for 50 % coverage. Details desired as per your letter are enclosed.

As highlighted earlier Spice Communications limited has been amalgamated into Idea Cellular Limited w.e.f. March 1, 2010 through court processes and the rollout of the merged entity is already complete. You may also kindly note TDSAT judgment dated 5th December 2011 in Petition no 238, 240-243 of 2011, in this regard.

Further you may note that Idea continuous to operate the licenses of erstwhile Spice Communications in Punjab & Karnataka as per orders dated 21st July 2011 of Division Bench of Delhi High Court in Appeal no. 42 of 2011. You may further kindly note that on 4th July 2011 Single Judge of the Hon'ble Delhi High Court reaffirmed the Merger of Spice Communications Limited with Idea Cellular Limited and our request for transfer of licenses held by erstwhile Spice in favour of Idea remain pending with DoT.

Thanking you

for IDEA Cellular Limited


 Rahul Vatts

Assistant Vice President – Regulatory

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North East Services Ltd

Sl. No	Service Fee	Date of Commencement	Date of Acquisition of Investment	Amount Invested (Rs. in Lakhs)	Days for 10% Completion of Investment	Total No. of Shares	No. of CoCo Covered	No. of Terms/Coverages received in form of CoCo Issuances	Sum of Priced CoCo Covered (Lakhs)	Whether complying to 3 yr lock-in obligations	Date of Registration	Registration No.	Whether copy of TRIM Cell registration certificate already submitted to TRAC	Remarks if any
1				4 days							14-Dec-09	TRIM/NE/13/09/001A/Thomson/Dec-09	Copy of TRIM Cell registration certificate already submitted to TRAC	
2				147 days							14-Dec-10	TRIM/NE/13/10/001A/Thomson/Dec-10	Copy of TRIM Cell registration certificate already submitted to TRAC	
3				100 days							11-Dec-09	TRIM/NE/13/09/001B/Thomson/Dec-09	Copy of TRIM Cell registration certificate already submitted to TRAC	
4				100 days							13-Dec-09	TRIM/NE/13/09/001C/Thomson/Dec-09	Copy of TRIM Cell registration certificate already submitted to TRAC	
5				100 days							11-Dec-09	TRIM/NE/13/09/001D/Thomson/Dec-09	Copy of TRIM Cell registration certificate already submitted to TRAC	
6				100 days							11-Dec-09	TRIM/NE/13/09/001E/Thomson/Dec-09	Copy of TRIM Cell registration certificate already submitted to TRAC	
7				100 days							11-Dec-09	TRIM/NE/13/09/001F/Thomson/Dec-09	Copy of TRIM Cell registration certificate already submitted to TRAC	
8				37 days							28-Dec-09	TRIM/NE/13/09/001G/Thomson/Dec-09	Copy of TRIM Cell registration certificate already submitted to TRAC	
9				137 days							14-Dec-10	TRIM/NE/13/10/001A/Thomson/Dec-10	Copy of TRIM Cell registration certificate already submitted to TRAC	
10				137 days							14-Dec-10	TRIM/NE/13/10/001B/Thomson/Dec-10	Copy of TRIM Cell registration certificate already submitted to TRAC	
11				3 days							25-Dec-09	TRIM/NE/13/09/001H/Thomson/Dec-09	Copy of TRIM Cell registration certificate already submitted to TRAC	
12				7 days							28-Dec-09	TRIM/NE/13/09/001I/Thomson/Dec-09	Copy of TRIM Cell registration certificate already submitted to TRAC	
13				137 days							14-Dec-10	TRIM/NE/13/10/001A/Thomson/Dec-10	Copy of TRIM Cell registration certificate already submitted to TRAC	
14				137 days							14-Dec-10	TRIM/NE/13/10/001B/Thomson/Dec-10	Copy of TRIM Cell registration certificate already submitted to TRAC	
15		25-Jan-08	23-Oct-08			55	22 (Haryana, Jharkhand, Madhya Pradesh, Rajasthan, Uttar Pradesh, West Bengal, Andhra Pradesh, Karnataka, Kerala, Tamil Nadu, Gujarat, Maharashtra, Chhattisgarh & Orissa)	7 (Chattisgarh, Madhya Pradesh, West Bengal, Jharkhand, Karnataka, Kerala, Tamil Nadu, Gujarat, Maharashtra, Chhattisgarh & Orissa)	28	Yes	28-Dec-11	TRIM/NE/13/11/001A/Thomson/Dec-11	Copy of TRIM Cell registration certificate already submitted to TRAC	
16				6 days							28-Dec-11	TRIM/NE/13/11/001B/Thomson/Dec-11	Copy of TRIM Cell registration certificate already submitted to TRAC	
17				28 days							18-Dec-11	TRIM/NE/13/11/001C/Thomson/Dec-11	Copy of TRIM Cell registration certificate already submitted to TRAC	
18				28 days							18-Dec-11	TRIM/NE/13/11/001D/Thomson/Dec-11	Copy of TRIM Cell registration certificate already submitted to TRAC	
19				28 days							18-Dec-11	TRIM/NE/13/11/001E/Thomson/Dec-11	Copy of TRIM Cell registration certificate already submitted to TRAC	
20				7 days							28-Dec-11	TRIM/NE/13/11/001F/Thomson/Dec-11	Copy of TRIM Cell registration certificate already submitted to TRAC	
21				18 days							18-Dec-11	TRIM/NE/13/11/001G/Thomson/Dec-11	Copy of TRIM Cell registration certificate already submitted to TRAC	
22				28 days							18-Dec-11	TRIM/NE/13/11/001H/Thomson/Dec-11	Copy of TRIM Cell registration certificate already submitted to TRAC	
23				28 days							18-Dec-11	TRIM/NE/13/11/001I/Thomson/Dec-11	Copy of TRIM Cell registration certificate already submitted to TRAC	
24				51 days							18-Dec-11	TRIM/NE/13/11/001J/Thomson/Dec-11	Copy of TRIM Cell registration certificate already submitted to TRAC	
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26				28 days							18-Dec-11	TRIM/NE/13/11/001L/Thomson/Dec-11	Copy of TRIM Cell registration certificate already submitted to TRAC	
27				28 days							18-Dec-11	TRIM/NE/13/11/001M/Thomson/Dec-11	Copy of TRIM Cell registration certificate already submitted to TRAC	
28				28 days							18-Dec-11	TRIM/NE/13/11/001N/Thomson/Dec-11	Copy of TRIM Cell registration certificate already submitted to TRAC	
29				28 days							18-Dec-11	TRIM/NE/13/11/001O/Thomson/Dec-11	Copy of TRIM Cell registration certificate already submitted to TRAC	

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Miss Bernadette Service 2011

Sl No	Service Area	Date of Service	Date of Assessment of Performance	Assessment Period (No. of Days)	Total No. of Services	No. of Days Covered	No. of Terms/Chgs covered in form of (DAG) (Subsequent)	Sum of Charges Covered (Rs)	Whether compliance to S.P. (all) not obligation	Date of Registration	Registration No.	Whether copy of TRM for registration certificate already submitted to TRM*	Remarks if any
1				08 days						18-Feb-10	TRM/W/1910/004/Overland Harbour	Copy of TRM registration certificate already provided vide our letter dated 13.05.2011.	
2				08 days						18-Feb-10	TRM/W/1910/004/Overland Harbour	Copy of TRM registration certificate already provided vide our letter dated 13.05.2011.	
3				08 days						18-Feb-10	TRM/W/1910/004/Overland Harbour	Copy of TRM registration certificate already provided vide our letter dated 13.05.2011.	
4				08 days						18-Feb-10	TRM/W/1910/004/Overland Harbour	Copy of TRM registration certificate already provided vide our letter dated 13.05.2011.	
5				18 days						4-Mar-10	TRM/W/1910/004/Overland Harbour	Copy of TRM registration certificate already provided vide our letter dated 13.05.2011.	
6				31 days						18-Feb-10	TRM/W/1910/004/Overland Harbour	Copy of TRM registration certificate already provided vide our letter dated 13.05.2011.	
7	100	25-Feb-10	5-Mar-10	24 days	24	24	7 (Transformation, Change of Name, Termination, Suspended & Discontinued)		Yes	18-Feb-10	TRM/W/1910/004/Overland Harbour	Copy of TRM registration certificate already provided vide our letter dated 13.05.2011.	
8				100 days						18-Feb-10	TRM/W/1910/004/Overland Harbour	Copy of TRM registration certificate already provided vide our letter dated 13.05.2011.	
9				08 days						4-Mar-10	TRM/W/1910/004/Overland Harbour	Copy of TRM registration certificate already provided vide our letter dated 13.05.2011.	
10				78 days						18-Feb-10	TRM/W/1910/004/Overland Harbour	Copy of TRM registration certificate already provided vide our letter dated 13.05.2011.	
11				08 days						25-Feb-10	TRM/W/1910/004/Overland Harbour	Copy of TRM registration certificate already provided vide our letter dated 13.05.2011.	
12				08 days						25-Feb-10	TRM/W/1910/004/Overland Harbour	Copy of TRM registration certificate already provided vide our letter dated 13.05.2011.	
13				78 days						18-Feb-10	TRM/W/1910/004/Overland Harbour	Copy of TRM registration certificate already provided vide our letter dated 13.05.2011.	

Online Services

Sl. No.	Service Area	Date of License Allocation of System	Date of Allocation of System	Average SACFA Meter Per Day without Obstruction	Date of Completion of Disposal	Total No. of Trucks	No. of Trucks Covered	No. of Trucks covered in list of trucks	No. of Trucks covered in list of trucks	Date of Disposal Covered (Date)	Whether complying to S/T related obligations	Register Ref. No.	Whether copy of TRM registration certificate already submitted to TIAI	Remarks if any
1				24 days								TRM/CD/09-1024/02A-07	Whether copy of TRM registration certificate already submitted to TIAI	
2				24 days								TRM/CD/09-1024/02A-07	Copy of TRM registration certificate already provided vide letter dated 21.05.2011.	
3				42 days								TRM/CD/09-1024/02A-14	Copy of TRM registration certificate already provided vide letter dated 23.05.2011.	
4				30 days								TRM/CD/09-1024/02A-04	Copy of TRM registration certificate already provided vide letter dated 23.05.2011.	
5				48 days								TRM/CD/09-1024/02A-05	Copy of TRM registration certificate already provided vide letter dated 23.05.2011.	
6				48 days								TRM/CD/09-1024/02A-10	Copy of TRM registration certificate already provided vide letter dated 23.05.2011.	
7				30 days								TRM/CD/09-1024/02A-13	Copy of TRM registration certificate already provided vide letter dated 23.05.2011.	
8				42 days								TRM/CD/09-1024/02A-15	Copy of TRM registration certificate already provided vide letter dated 23.05.2011.	
9				24 days								TRM/CD/09-1024/02A-17	Copy of TRM registration certificate already provided vide letter dated 23.05.2011.	
10				30 days								TRM/CD/09-1024/02A-11	Copy of TRM registration certificate already provided vide letter dated 23.05.2011.	
11				24 days								TRM/CD/09-1024/02A-11	Copy of TRM registration certificate already provided vide letter dated 23.05.2011.	
12				42 days								TRM/CD/09-1024/02A-11	Copy of TRM registration certificate already provided vide letter dated 23.05.2011.	
13				48 days								TRM/CD/09-1024/02A-11	Copy of TRM registration certificate already provided vide letter dated 23.05.2011.	
14				48 days								TRM/CD/09-1024/02A-11	Copy of TRM registration certificate already provided vide letter dated 23.05.2011.	
15				48 days								TRM/CD/09-1024/02A-11	Copy of TRM registration certificate already provided vide letter dated 23.05.2011.	

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1. Through
Program,
Registration,
through License
(A, B, C, D, E, F, G, H, I, J, K, L, M, N, O, P, Q, R, S, T, U, V, W, X, Y, Z, AA, AB, AC, AD, AE, AF, AG, AH, AI, AJ, AK, AL, AM, AN, AO, AP, AQ, AR, AS, AT, AU, AV, AW, AX, AY, AZ, BA, BB, BC, BD, BE, BF, BG, BH, BI, BJ, BK, BL, BM, BN, BO, BP, BQ, BR, BS, BT, BU, BV, BW, BX, BY, BZ, CA, CB, CC, CD, CE, CF, CG, CH, CI, CJ, CK, CL, CM, CN, CO, CP, CQ, CR, CS, CT, CU, CV, CW, CX, CY, CZ, DA, DB, DC, DD, DE, DF, DG, DH, DI, DJ, DK, DL, DM, DN, DO, DP, DQ, DR, DS, DT, DU, DV, DW, DX, DY, DZ, EA, EB, EC, ED, EE, EF, EG, EH, EI, EJ, EK, EL, EM, EN, EO, EP, EQ, ER, ES, ET, EU, EV, EW, EX, EY, EZ, FA, FB, FC, FD, FE, FF, FG, FH, FI, FJ, FK, FL, FM, FN, FO, FP, FQ, FR, FS, FT, FU, FV, FW, FX, FY, FZ, GA, GB, GC, GD, GE, GF, GG, GH, GI, GJ, GK, GL, GM, GN, GO, GP, GQ, GR, GS, GT, GU, GV, GW, GX, GY, GZ, HA, HB, HC, HD, HE, HF, HG, HH, HI, HJ, HK, HL, HM, HN, HO, HP, HQ, HR, HS, HT, HU, HV, HW, HX, HY, HZ, IA, IB, IC, ID, IE, IF, IG, IH, II, IJ, IK, IL, IM, IN, IO, IP, IQ, IR, IS, IT, IU, IV, IW, IX, IY, IZ, JA, JB, JC, JD, JE, JF, JG, JH, JI, JJ, JK, JL, JM, JN, JO, JP, JQ, JR, JS, JT, JU, JV, JW, JX, JY, JZ, KA, KB, KC, KD, KE, KF, KG, KH, KI, KJ, KK, KL, KM, KN, KO, KP, KQ, KR, KS, KT, KU, KV, KW, KX, KY, KZ, LA, LB, LC, LD, LE, LF, LG, LH, LI, LJ, LK, LL, LM, LN, LO, LP, LQ, LR, LS, LT, LU, LV, LW, LX, LY, LZ, MA, MB, MC, MD, ME, MF, MG, MH, MI, MJ, MK, ML, MM, MN, MO, MP, MQ, MR, MS, MT, MU, MV, MW, MX, MY, MZ, NA, NB, NC, ND, NE, NF, NG, NH, NI, NJ, NK, NL, NM, NN, NO, NP, NQ, NR, NS, NT, NU, NV, NW, NX, NY, NZ, OA, OB, OC, OD, OE, OF, OG, OH, OI, OJ, OK, OL, OM, ON, OO, OP, OQ, OR, OS, OT, OU, OV, OW, OX, OY, OZ, PA, PB, PC, PD, PE, PF, PG, PH, PI, PJ, PK, PL, PM, PN, PO, PP, PQ, PR, PS, PT, PU, PV, PW, PX, PY, PZ, QA, QB, QC, QD, QE, QF, QG, QH, QI, QJ, QK, QL, QM, QN, QO, QP, QQ, QR, QS, QT, QU, QV, QW, QX, QY, QZ, RA, RB, RC, RD, RE, RF, RG, RH, RI, RJ, RK, RL, RM, RN, RO, RP, RQ, RR, RS, RT, RU, RV, RW, RX, RY, RZ, SA, SB, SC, SD, SE, SF, SG, SH, SI, SJ, SK, SL, SM, SN, SO, SP, SQ, SR, SS, ST, SU, SV, SW, SX, SY, SZ, TA, TB, TC, TD, TE, TF, TG, TH, TI, TJ, TK, TL, TM, TN, TO, TP, TQ, TR, TS, TT, TU, TV, TW, TX, TY, TZ, UA, UB, UC, UD, UE, UF, UG, UH, UI, UJ, UK, UL, UM, UN, UO, UP, UQ, UR, US, UT, UY, UV, UW, UX, UY, UZ, VA, VB, VC, VD, VE, VF, VG, VH, VI, VJ, VK, VL, VM, VN, VO, VP, VQ, VR, VS, VT, VU, VW, VX, VY, VZ, WA, WB, WC, WD, WE, WF, WG, WH, WI, WJ, WK, WL, WM, WN, WO, WP, WQ, WR, WS, WT, WU, WV, WW, WX, WY, WZ, XA, XB, XC, XD, XE, XF, XG, XH, XI, XJ, XK, XL, XM, XN, XO, XP, XQ, XR, XS, XT, XU, XV, XW, XX, XY, XZ, YA, YB, YC, YD, YE, YF, YG, YH, YI, YJ, YK, YL, YM, YN, YO, YP, YQ, YR, YS, YT, YU, YV, YW, YX, YZ, ZA, ZB, ZC, ZD, ZE, ZF, ZG, ZH, ZI, ZJ, ZK, ZL, ZM, ZN, ZO, ZP, ZQ, ZR, ZS, ZT, ZU, ZV, ZW, ZX, ZY, ZZ

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ADMINISTRATIVE

Sl. No	Service Area	Date of License	Date of Acquisition of Spectrum	Average SATCA duty for 30 days (without obligation)	No. of days completed for Non-Duty	Total No. of days	No. of days covered	No. of times covered in line of work (submissions)	Sum of days covered (A+B)	Indicates compliance to 37 and 38 obligations	Date of registration	Registration No.	Whether copy of TRM certificate submitted to TRM	Remarks, if any
1				24 days							24-09-09	TRM/AM/PA/02/A/01	Copy of TRM Service Certificate already provided vide our letter dated 23.05.2011	
2				21 days							23-09-10	TRM/AM/PA/02/A/07 SEP-10	Copy of TRM registration certificate already provided vide our letter dated 23.05.2011	
3				27 days							27-09-10	TRM/AM/PA/02/A/08 SEP-10	Copy of TRM registration certificate already provided vide our letter dated 23.05.2011	
4				19 days							18-09-08	TRM/AM/PA/02/A/03 DEC-09	Copy of TRM registration certificate already provided vide our letter dated 23.05.2011	
5				18 days							21-09-10	TRM/AM/PA/02/A/04 OCT-10	Copy of TRM registration certificate already provided vide our letter dated 23.05.2011	
6				18 days							21-09-10	TRM/AM/PA/02/A/05 OCT-10	Copy of TRM registration certificate already provided vide our letter dated 23.05.2011	
7				8 days	24 days 11	27	23	1 (10/10/08)	34	Yes	27-09-10	TRM/AM/PA/02/A/06 SEP-10	Copy of TRM registration certificate already provided vide our letter dated 23.05.2011	
8	Assam	25-10-08	25-09-08	5 days			1 (10/10/08)	1	14	Yes	04-09-10	TRM/AM/PA/02/A/11 SEP-10	Copy of TRM registration certificate already provided vide our letter dated 23.05.2011	
9				18 days							14-09-08	TRM/AM/PA/02/A/09 SEP-10	Copy of TRM registration certificate already provided vide our letter dated 23.05.2011	
10				0 days							27-09-10	TRM/AM/PA/02/A/02 DEC-09	Copy of TRM registration certificate already provided vide our letter dated 23.05.2011	
11				13 days							27-09-10	TRM/AM/PA/02/A/03 DEC-09	Copy of TRM registration certificate already provided vide our letter dated 23.05.2011	
12				11 days							27-09-10	TRM/AM/PA/02/A/04 OCT-10	Copy of TRM registration certificate already provided vide our letter dated 23.05.2011	
13				157 days							04-09-10	TRM/AM/PA/02/A/05 OCT-10	Copy of TRM registration certificate already provided vide our letter dated 23.05.2011	
14				11 days							27-09-10	TRM/AM/PA/02/A/02 DEC-09	Copy of TRM registration certificate already provided vide our letter dated 23.05.2011	
15				11 days							04-09-10	TRM/AM/PA/02/A/03 DEC-09	Copy of TRM registration certificate already provided vide our letter dated 23.05.2011	