

The T.R.A.I., New Delhi - 110 002

29.08.2013

Dear Sirs/Madam,

Additional Inputs on Permitting Trading of Spectrum in India

Mobile spectrum is indeed finite. But **spectrum is sufficient. Spectrum is not scarce.** Spectrum deployment in sufficiency is indeed crucial for national productivity. Equally, it is the policy premise upon which the telecom sector moved from a command-and-control to a market based mode. It is **India uniquely** which, contrary to avowed policy, **has converted spectrum sufficiency into scarcity.** This has been achieved through the

1. **Physical capture of Spectrum.** Traditionally through just holding back spectrum, lately also through sky-high reserve prices.
2. **Misallocation of Spectrum.** Even some of the insufficient allocated spectrum is either underused or unused, aided by an indulgent spectrum usage charging regime.
3. **Strangling of Spectrum.** Fanciful labels like un-liberalized spectrum, about-turns on Intra-Circle-Roaming, impossible M&A dispensations, all contribute to contrived scarcity. Opposition to Spectrum Trading is but a part of this syndrome.

Our nation is in an economic crisis. A feature has been the retreat from policies based on principles, to policies of contrived scarcities which suit only license raj warriors. **The Authority may please recommend spectrum trading, because of inherent merit, as also to move the sector away from a command-and-control to a market-based dispensation.**

Thank you.

Yours sincerely,

SANJEEV AGA - (Individual)