



ARYA OMNITALK
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Aryaomnitalk Radio Trunking Services Private Limited,

Unit No.202, 2nd Floor, Summer Court,
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www.aryaomnitalk.com

S/No.	TRAI Question	AORTSPL Comments	Vodafone	Jio	ITU-APT	Consumer Protection Association
1	Whether there is a need to review the terms and conditions of PMRTS License and PMRTS Authorization under Unified License? Kindly provide a detailed response with justifications	Yes, Spectrum thru administratively only.	Spectrum thru Auction only	Spectrum thru Auction only	Yes, Spectrum to be allocated administratively basis only.	Yes, Spectrum thru Auction only
2	In case it is decided to review the terms and conditions of PMRTS License and PMRTS Authorization under Unified License, in what manner should the following conditions be amended? (a) Scope of the license (b) Roll out obligation (c) Technical conditions (d) Network interconnection (e) Security conditions (f) Any other (please specify).	PSTN connectivity not Required. Site inter-connectivity Required in the same LSA.	Spectrum thru Auction only	Spectrum thru Auction only	IOT to be added with PMRTS, Network Interconnection to be allowed, Roaming facility etc	
		PMRTS services are used by varied types of organisations which include crucial Public utility services (Municipal corporations, Metro water, Electricity Boards, Hospitals, Ambulance services, PSU's, Indian Navy, Military establishments, Education institutions etc). These establishments are looking for a network which is reliable during times of natural disaster & is managed on 24/7 basis by professionals thus ensuring highest system uptime . We agree that Spectrum is a scarce resource and it must be utilised effectively. On this consideration the Department should firstly dissuade the release of spectrum for CMRTS application as PMRTS is more spectrum efficient & more lucrative and easier to administer for the department. CMRTS must be dissuaded in service areas where PMRTS is operational. In all circumstances the Govt cant be looking at maximum revenue generation only as there may be situations where the Govt has to offer rebates based on the serving of Public interest at large. Govt has to even render few services on a cost effective manner in the public interest / public safety, social responsibility hence it will not be always possible / feasible for the government t consider auction for release of spectrum .	AORTSPL-Comment: PMRTS services are used by varied types of organisations which include crucial Public utility services (Municipal corporations, Metro water, Electricity Boards, Hospitals, Ambulance services, PSU's, Indian Navy, Military establishments, Education institutions etc). These establishments are looking for a network which is reliable during times of natural disaster & is managed on 24/7 basis by professionals thus ensuring highest system uptime . We agree that Spectrum is a scarce resource and it must be utilised effectively. On this consideration the Department should firstly dissuade the release of spectrum for CMRTS application as PMRTS is more spectrum efficient & more lucrative and easier to administer for the department. CMRTS must be dissuaded in	AORTSPL-Comment: PMRTS services are used by varied types of organisations which include crucial Public utility services (Municipal corporations, Metro water, Electricity Boards, Hospitals, Ambulance services, PSU's, Indian Navy, Military establishments, Education institutions etc). These establishments are looking for a network which is reliable during times of natural disaster & is managed on 24/7 basis by professionals thus ensuring highest system uptime . We agree that Spectrum is a scarce resource and it must be utilised effectively. On this consideration the Department should firstly dissuade the release of spectrum for CMRTS application as PMRTS is more spectrum efficient & more lucrative and easier to administer for the department. CMRTS must be dissuaded in		AORTSPL-Comment: PMRTS services are used by varied types of organisations which include crucial Public utility services (Municipal corporations, Metro water, Electricity Boards, Hospitals, Ambulance services, PSU's, Indian Navy, Military establishments, Education institutions etc). These establishments are looking for a network which is reliable during times of natural disaster & is managed on 24/7 basis by professionals thus ensuring highest system uptime . We agree that Spectrum is a scarce resource and it must be utilised effectively. On this consideration the Department should firstly dissuade the release of spectrum for CMRTS application as PMRTS is more spectrum efficient & more lucrative and easier to administer for the department.
3	Whether PMRTS providers should be permitted Internet connectivity with static IP addresses? Kindly provide a detailed response with justification	Yes	No need otherwise will be part of access services	Yes	To be allowed	Yes



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			AORTSPL-Comments: Internet connectivity with static IP is necessary for very limited / basic application. Digital PMRTS operates on client server architecture where in server could be in a different city to the remote radiating site under UL. This architecture is necessary for authorisation of subscriber terminals on the server & for monitoring remote site / system - health status. PMRTS industry is not looking at increasing the scope of service other than intra city calls limited to respective UL.			
4	Whether there is a need to review the extant provisions relating to service area for PMRTS Authorization under Unified License? If yes, whether it would be appropriate to grant PMRTS Authorization for three different categories with service area as (a) National Area; (b) Telecom circle/ Metro Area; and (c) Secondary Switching Area (SSA)? Kindly provide a detailed response with justification.	Yes	LSA basis only	No need to change in Service Area	Yes, SSA Area/Telecom Circle and National Area wise to be defined	Yes, SSA Area/Telecom Circle and National Area wise to be defined
		For Category C, Royalty 48K for 5 Channels	AORTSPL-Comment: O.K			
		For Category B, Royalty 4 times of Catogaory C				
		For Category A, Royalty 10 times of Catogaory C				
5	Whether there is a need to review the extant provisions relating to the authorized area for use of a particular frequency spectrum to PMRTS providers? If yes, in what manner should these provisions be amended? Kindly provide a detailed response with justification.	Yes, reuse in same service area to be allowed	LSA basis only	No need to change in Service Area	PMRTS providers to be allowed use spectrum in amy area of India	Yes
			AORTSPL discussion on this case is not about fresh allocation.			



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6	Whether there is a need to review the mechanism of shifting the fixed station from one location to another location within the authorized area for use of a particular frequency spectrum? If yes, what should be the terms and conditions for such permission? Kindly provide a detailed response with justification.	Yes	No Comment available	no	To be allowed	No Comments
				AORTSPL-Comment: Agree	AORTSPL-Comment: Spectrum sharing within multiple PMRTS Providers to be allowed	
7	Whether there is a need to permit PMRTS providers to shift a few frequency carriers out of a pool of frequency carriers, assigned to an existing Fixed Station, to a new Fixed Station located within the authorized area for use of the pool of frequency carriers? If yes, in what manner the challenges arising out of such partial shifting of frequency carriers may be mitigated? Kindly provide a detailed response with justification.	Yes	No Comment available	no	To be allowed	No Comments
				AORTSPL-Comment: Industries, warehouses have shifted base to the outskirts of the city. Hence operators should be allowed to shift a few frequencies out of the already allocated block of frequency to areas where business opportunities exist within the same LSA.		
8	Whether there is a need to review the requirement of obtaining Wireless Operating License (WOL) by PMRTS providers? Kindly provide a detailed response with justification	Requirement of renewal of WOL every year to be removed	No Comment available	Requirement of renewal of WOL every year to be removed	Requirement of renewal of WOL every year to be removed	Yes
				AORTSPL-Comment: Agree		
9	Whether there is a need to review the provisions related to sale, lease and rent of the radio terminals of PMRTS? Kindly provide a detailed response with justification.	Yes	No Comment available	to be added in APGR		
		In AGR, C/o Purchase price to be reduced from Sale price		AORTSPL is In agreement with JIO comments on page 2 & 3, point no. I, II, III		
		Rental to be allowed in DPL			Rental to be allowed in DPL	Permit renting



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10	in, case your response to the Q9 is in the affirmative, what kind of changes will be required in PMRTS licenses and Dealer Possession License (DPL) and guidelines? Kindly provide a detailed response with justification.	Already change made by WPC in SARAL Portal	No Comment available			
11	Whether there is a need to review the provisions related to import of the radio terminals of PMRTS? Kindly provide a detailed response with justification	for Import of radio terminal to be allowed in OGL to TSPs		to be checked from DOT why the radios are not considered under OGL	for Import of radio terminal to be allowed in OGL to TSPs	to be import under Import License
12	Whether there is a need to review the provisions related to replacement of unserviceable network elements of PMRTS? Kindly provide a detailed response with justification.	expeditious, automatic approval required	No Comment available		to be allowed in timely manner.	Yes
13	Whether Whether there is need to review the recommendation No 4.5 (mentioned below) of the TRAI's Recommendations on 'Method of allocation of spectrum for Public Mobile Radio Trunking Service (PMRTS) including auction, as a transparent mechanism' dated 20.07.2018, which are under consideration of DoT?	Not required	Spectrum thru Auction only	Spectrum thru Auction only	Not required. Spectrum to be allocated administratively basis only.	No Comments
			AORTSPL-Comment: Pls refer our comments under question No:1	AORTSPL-Comment: Pls refer our comments under question No:1		
14	Whether there is a need to mandate PMRTS providers to migrate to spectrally efficient digital technologies in a time-bound manner? If yes, what should be the time frame for mandatory migration to spectrally efficient digital technologies? Kindly provide a detailed response with justification.	4 to 5 years be given for migration.	regulatory mandate not required, this should be left on the market forces and consumer choice.	Migration should be market-driven and not mandated and incentive-based approach shud be folowed.	Migration should be done in a reasonable timeframe.	Yes, In time bound manner
15	in, case your response to Q14 is negative, what measures should be taken to nudge and encourage PMRTS providers to migrate to spectrally efficient digital technologies? Kindly provide a detailed response with justification.	N.A as our ans is yes for Q-14	regulatory mandate not required, this should be leave on the market forces and consumer choice.	AORTSPL-Comment: Agree Migration should be market-driven and not mandated and incentive-based approach shud be folowed.	N.A as ans is yes for Q-14	N.A as ans is yes for Q-14
			AORTSPL-Comment: Agree	AORTSPL-Comment: Agree		



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16	Whether it is possible to deliver the PMRTS/ CMRTS, which are mission- critical in nature, using 4G/ 5G Network Slicing or any other technology? If yes, in what manner should the delivery of PMRTS/ CMRTS using 4G/ 5G network slicing be enabled in the license? What should be safeguards to ensure that the quality-of-service for cellular networks is not adversely impacted? Kindly provide a detailed response with justification	No Radios/Network available at present for using 4G/ 5G network slicing	Using 4G/5G Network Slicing for PMRTS/PMRTS depends on variour factors, Hence the regulatory norms should enable networks-slicing arrangements, without making them mandatory.	leveraging Network slicing use cases should be permi ed for PMRTS/CMRTS. However, these use cases should be market driven and the Authority should ensure that there are no restric ons on leveraging network slicing for delivering mission cri cal PMRTS/ CMRTS, services.	It is possible to deliver 4G/5G network slicing. 4G/5G Operators should carefully manage the resourses that are allocated to PMRTS/CMRTS Services.	Yes
			AORTSPL: No comments	AORTSPL: No comments	AORTSPL: No comments	AORTSPL: No comments
17	Whether there is a need to review the terms and conditions of PMRTS Authorization under Unified License (VNO)? Kindly provide a detailed response with justification	Conditions to be same for VNO and UL (PMRTS)	No Comments	No need to review	Need to review	Mentioned in Comments
				AORTSPL comments: Agreed for no review		
18	In case it is decided to review the terms and conditions of PMRTS authorization under Unified License (VNO), in what manner should the following existing provisions be amended?	Ref Ans 17	No Comments	No need to review	Mentioned in the Paper	Mentioned in Comments
				AORTSPL comments: Agreed for no review		
19	Whether there is any other issue relevant for review of terms and conditions of the PMRTS License, PMRTS Authorization under Unified License, and PMRTS authorization under Unified License (VNO)? Kindly provide a detailed response with justifications.	Ref Ans 17	Spectrum thru Auction only	None	Mentioned in the Paper	No Comment
			AORTSPL Comments: Conditions to be same for VNO under UL (PMRTS) regime			
20	Whether there is a need to review the terms and conditions of CMRTS license? Kindly provide a detailed response with justifications	Providing a Radio Trunking Service on a chargeable basis to different agencies not falling in the ownership of the CMRTS Licensee to be stopped.	Spectrum thru Auction only except fpr Police, Fire and Government security	No need to review But CMRTS shud be made part of UL	Yes	Mentioned in Comments
		License and Spectrum Fee for both CMRTS and Captive should be disproportionately higher than PMRTS	Charges for CMRTS and PMRTS to be same	AORTSPL Comments: CMRTS not to be brought under UL regime. License and Spectrum Fee for CMRTS should be disproportionately higher than PMRTS	CMRTS Providers shud not to be required to take license from DOT. They shud be allowed to take spectrum directly from WPC as other Captive users doing.	



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			AORTSPL Comments: License and Spectrum Fee for CMRTS should be disproportionately higher than PMRTS		AORTSPL Comments: We do not agree to this. CMRTS is a similar service to PMRTS and hence license is to be taken. If end customer is not required to take license then this will lead to over crowding . This will impact the business of PMRTS operators.	
21	What should be the eligibility conditions for obtaining CMRTS license? Further, what should be the application processing fee for CMRTS license? Kindly provide a detailed response with justification	Where ever PMRTS services are not available, only at such location CMRTS license may be issued	Ref Ans 20	Ref Ans 20	Ref Ans 20	Ref Ans 20
22	In case it is decided to review the terms and conditions of CMRTS license, in what manner should the following terms and conditions be amended	Ref Ans 20	Ref Ans 20	Ref Ans 20	Ref Ans 20	Ref Ans 20
23	Whether there is a need to mandate CMRTS licensees to migrate to spectrally efficient digital technologies in a time-bound manner? If yes, what should be the time frame for mandatory migration to spectrally efficient digital technologies? Kindly provide a detailed response with justification.	Same as for PMRTS	regulatory mandate not required, this should be left on the market forces and consumer choice.		Migration should be done in a reasonable timeframe.	Migration should be done in a reasonable timeframe.
24	In case your response to Q23 is in the negative, what provisions should be made to nudge and encourage CMRTS licensees to spectrally efficient digital technologies? Kindly provide a detailed response with justification	N.A as our ans is yes for Q-23	regulatory mandate not required, this should be left on the market forces and consumer choice.		Migration should be done in a reasonable timeframe.	No Comment
25	Whether there is any other issue relevant for review of terms and conditions of the CMRTS License? Kindly provide a detailed response with justifications	Ref Ans 20	No Comments		Mentioned in the Paper	No Comment
26	Is there a need to review the license fee prescribed for PMRTS/CMRTS? Please justify your answer. If yes, please suggest detailed methodology for arriving at the license fees for PMRTS/CMRTS with justification	No need to review the license fee prescribed for PMRTS	8% AGR as uniformly applicable for other services	No need to review	AGR to be 5% for all licenses	No Comment



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		However, We suggest reviewing the license fee prescribed for CMRTS for ensuring a level playing field.		Not agree with vies of Gujarat Metro Rail Corp		
27	Whether there is a need to review the allocation of spectrum for PMRTS? If yes, what changes should be made in the allocation of spectrum for PMRTS in the National Frequency Allocation Plan? Kindly provide a detailed response with justifications	No need to review	Spectrum thru Auction only	Spectrum thru Auction only	Spectrum to be allocated adminitratively basis only.	Spectrum thru Auction only
					AORTSPL Comments: Agree	
28	What should be the method of assignment of spectrum for PMRTS? (a) Auction; or (b) Administrative	Administrative	Spectrum thru Auction only	Spectrum thru Auction only	Spectrum to be allocated adminitratively basis only.	Spectrum thru Auction only
			AORTSPL Comments: Refer answer to Q2		AORTSPL Comments: Agree	AORTSPL Comments: Refer answer to Q2
29	In case it is decided to auction the frequency spectrum allocated to PMRTS: reply the points A to H.	We are not in favor of Auction	Spectrum thru Auction only	Spectrum thru Auction only	Spectrum to be allocated adminitratively basis only.	No Comment
30	In case auction methodology is to be followed for assignment of spectrum: reply the points A to E.	We are not in favor of Auction	Spectrum thru Auction only		Spectrum to be allocated adminitratively basis only.	No Comment
31	Whether there are any other issues/ suggestions relevant to subject ? If yes, the same may kindly be furnished with proper justification	No Spectrum to PMRTS since July 2014. PMRTS and CMRTS are the same type of Services. Total Annual Revenue of PMRTS Industry is Approx 50 crore. Spectrum for PMRTS to be reserved by 8 MHz. PMRTS operators to be encouraged to run a PPDR. PMRTS Industry is not prime real estate in the same context when compared with Access Services such as Cellular, where auction is the best methodology given its earning potential, billion plus subscribers over which the auctioned cost for Spectrum can be apportioned so as to form a small fraction/miniscule percentage of their ARPU.	No Comments		Mentioned in the Paper	No

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