

To

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(Through E-Mail: atdyadvbcs-1@traf.gov.in)

Hello Advisor & Team – TRAI:

SUB: CC on Ease of Doing Business in Telecom and Broadcasting Sector – Reg.

“9” points that are required to put “ease” tag

The comments & inputs noted and team TRAI/DOT/Ministries/Departments/Service providers/stake-holders /respondents needs to have a fresh re-look about the **main philosophy** of doing telecom business and that to with an ease as it was proposed in this CP. Significance of the following items are missed/not properly addressed in the inputs or CP itself, so this is the time to have detailed study on the following if to create ease in doing telecom business in the nation:

Point 1:

- a) Overhead of spectrum cost is a burdening issue to service providers directly as well indirectly to the users/citizens.
- b) Every time bidding and acquiring new spectrum by an existing service providers is a big capital investment. In addition to spectrum bidding cost, service providers need to procure latest technological equipments/devices to roll-out across their operational area as well to maintain it.
- c) Acquiring funds from banks, later unable to pay back to banks, means it is big loss to the banks as well the depositors/citizens.
- d) Govt. is getting lot of GST on telecom / broadcast services. Hence, it is suggested that
 - All existing wireless service providers are to be provided new spectrum at “zero” cost.
 - Any new entrant can pay the **one time** spectrum cost.

Point 2:

- a) No guarantee for the spectrum already acquired by the service providers. I.e. service provider/s, who acquired 3G spectrum during 2010, again they invested huge to acquire 4G spectrum in span of 5 to 6 years. Again now they are bound to acquire 5G spectrum. I.e. on an average 5 to 6 years the technology shifting...leading to invest on spectrum again and again.
- b) Spectrum procured with an expected life of about 20 years, but in reality all the financial calculations (ROI, etc) distracted due to “nG” game, leading Service providers with huge loans & interests.
- c) Service provider’s money is supposed to invest for better & quality services to the citizens, but due to present system of spectrum procurement, the money earned by service providers is being utilized to pay bank interests.
- d) Service provider companies cannot survive with this present system.
- e) Existing Service providers who invested multiple times to acquire new spectrum are to be compensated basing on the number of years they actually used the acquired spectrum.

Point 3:

- a) Many years back, long long ago....so long ago..... it was made multiple LSAs within Nation, when no one thought of “on-line” and VNOs. Keeping present conditions, before further proceeding it is suggested to:
 - b) Merge all LSAs
 - c) Declare **one Nation one LSA**

- d) **One Nation One LSA** makes service providers network simple and improving quality of services and reduces overheads.
- e) LSA offices of DOT may change name as State Offices or Regional offices.

Point 4:

- a) This is the time to declare about who have to acquire spectrum i.e. **Network Operators** or **Service Operators**?

Point 5:

- a) How many service providers are required in Nation?
- b) Quantum of spectrum plays major role while delivery of quality of services to the end users. If number of service providers increase, small quantum of spectrum only possible to each service provider. Keeping this point in view the number of players need in the nation is to be decided before release of any spectrum

Point 6:

- a) Spectrum cost (to charge “new entrants”) can be arrived based on the historical revenue collections of all the service providers, by a simple math on the parameters viz., how much spectrum in hold & how much revenue earned. This will be realistic and practical. Financial institutions also can track such parameters with ease and leads a healthy echo system.
- b) This will save the modern bidding processing time & technology costs.

Point 7:

- a) Whenever it is mentioned “International Practices”, it is to be specified, why that particular “Nation” is considered to include in the consultation document.
- b) Take the case of USA. This is mentioned because: “it is bigger country with democratic political environment as same in this Nation”..
- c) Take the case of China. This is mentioned because “ it is bigger country with huge population as in this Nation”
- d) Considering case studies of roll-out in small sized Nations, less populated Nations, etc. to be reviewed.

Point 8:

- a) Nation, with the present legal & enforcement system, is not ready to address the consequences of “**All Private**”
- b) Hence, **one PSU is required for every sector**

Point 9:

- a) Due to lack of regulation/guidance on various mobile operating systems/APPs, individual customers are investing again and again to purchase new devices even the device is ok with earlier version of operating system.
- b) In addition to the mobile device cost, it is required to have a safety plastic cover and a front panel protecting glass for majority mobile handsets. The amount spending on these two items are also huge and worth to consider.
- c) Internet & mobile device became basic necessary of every citizen, hence, decisions to be taken keeping in view that the impact of each and every common citizen’s pocket.
- d) Create **ease of doing business** as well **ease of using services** by bringing it in to common citizen’s budget.

Regards

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Accountability Note:

Any of above point mentioned is in-appropriate, kindly give feedback with supported reasoning.
If no feedback received (within 30 days) means, all the above points are worth to consider.