

**To**

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**Hello Advisor & Team – TRAI:**

While going through the comments/inputs submitted by various stakeholders, the following points have not clearly mentioned, which are crucial to consider at this stage:

- Average middle class families in the Nation are using about 2 to 4 smart phones in one family. About Rs.10,000/- are spending to have one smart phone (in addition to subscription costs). Huge capital is being invested not only by Tele-operators, but also by individuals. To safe guard the investment of individuals, the life of each smart phone/devices are to be properly assured (across & among “nG”s) including hardware & softwares (operating systems, apps, etc.) of the device.
- How much amount of Service Tax is being collected from tele/mobile services and through sale of tele/mobile devices/accessories is also to be spelled in the consultation paper in future. For now, while releasing recommendations, these figures are to be included.
- Huge volume of e-waste generated because of out-dated tele-equipments/devices as well due to fast changing technology (hardware/software). The responsibility of e-waste is to be specifically defined and the suppliers/manufactures are made stakeholder for safe disposal of the same. The figures related to generation of e-waste through tele-operators and tele-users is also to be spelled in the consultation paper, in future. For now, while releasing recommendations, these figures are to be included.
- The number of towers in IMT/5G is more (about one for every street), there will be lot of physical network equipment is required. If, more operators are allowed for IMT/5G services, there will more number of wireless towers / street infrastructures and accordingly there will be multiple volume of e-waste/scrap when the technology becomes out dated. To overcome such impacts, in all existing/future tele-operations including IMT/5G, it is to be adopted the system of Network Operators & Service Operators. I.e. required tele-network is to be owned/ maintained only by Network Operators for entire nation and these Network operators cannot offer service directly to end customer. Service Operators or VNOs will be offering services to end customer by having revenue sharing agreement with Network Operators. To reduce volume of future e-waste/scrap the number of Network Operators are to be minimum, whereas enough number of Service Operators /VNOs to have competition in the market. Any of the existing Tele Service providers in the Nation may opt for Network Operator and remaining can become Service Operators. Once fixed the number of Network operators & number of Service Operators, all together collectively decide the technology partner, vendor/supplier, etc. towards rolling out across Nation including rural/difficult terrains of the Nation.
- Consider that service providers who are offering 3G/4G services are shifted to offer 5G services. In this case, is there is any condition that needs to continue to offer 3G/4G services for defined period? The burden of change of mobile phone/devices due to such “nG” game is to be analyzed, while releasing recommendations.
- While selecting the frequencies range for tele-services, it is also to be considered to minimize adverse financial & environmental impacts. Such analysis also to be a part of the recommendations. The enthusiasm of adoption & rolling out new technologies should not create adverse impact on the society in any form.

Correction Note:

- 1) While providing 9-inputs on this consultation paper, the year part of date is mis-spelled as 10<sup>th</sup> January 2021 and the same may be read as 10<sup>th</sup> January 2022.
- 2) While forwarding the 9-inputs, in the mail text the date is mis-spelled as 20<sup>th</sup> Nov 2021 and the same may be read as 30<sup>th</sup> Nov 2021.

Regards

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