



Qualcomm India Private Limited

Corporate Identity Number (CIN): U64202DL1996PTC076991

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12th December, 2014

Dr. Rahul Khullar,
Chairman, Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan,
(next to Zakir Hussain College)
Jawaharlal Nehru Marg
(Old Minto Road)
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Via Facsimile: +91 11 23235249

Sub: Response on TRAI's Consultation Paper on "Valuation and Reserve Price of Spectrum: 2100 MHz Band"

Dear Dr. Khullar,

Qualcomm appreciates the opportunity to comment on the Telecommunications Regulatory Authority of India (TRAI) Consultation Paper No. 14/2014 on "*Valuation and Reserve Price of Spectrum: 2100 MHz Band*" dated 2nd December 2014.

India's ability to deliver affordable mobile broadband services will depend on each operator having adequate spectrum in mature bands that offer the most economies. With this in mind, the auction of spectrum in the 2100 MHz band must be high priority for India. As your consultation paper recognizes, 2100 MHz offers maximum economies of scale since it is internationally harmonized. It is therefore important to auction entire spectrum in this band at the earliest.

There are indications that 20 MHz of 2100 MHz spectrum will soon be available. Media reports suggest that there has been movement on the discussions, referred to in Annex 1 of the TRAI consultation, between DoT & defence on the release of 2100 MHz spectrum. They also suggest that Defence has agreed to swap 15 MHz of 2100 MHz band with 1900 MHz band currently with DoT.

In the light of the above developments, we have made the following recommendation

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Recommendation

Auction entire 20 MHz of 2100 MHz band : The auction can take place despite the fact that Defence is unable to vacate spectrum immediately for assignment. This is because the actual assignments do not have to be made immediately either. This can be carried out once the spectrum is cleared by Defence. The same practice was in fact followed during 2010 3G auctions. The NIA for the 210 3G auctions explicitly mentioned this in Para 4.6 which stated

“It may be noted that after assignment of 3G Spectrum, the licensees shall be allowed to utilise the spectrum for commercial operations only from 1st September, 2010. However, in the mean time, they can take steps to enable launch of commercial operations”

Auctioning spectrum in advance of its release is also international practice. For instance, in the ongoing auction (Auction #97 – AWS-3) in the US, the entire 65 MHz of AWS spectrum is currently locked up with US Federal Agencies including US DoD (<http://www.fcc.gov/document/joint-public-notice-announcing-aws-3-coordination-details>). The spectrum will be available for deployment only during later part of 2016 post coordination with various agencies. However, it is worth noting that despite the spectrum being unavailable for immediate deployment, the bidding is very aggressive.

Therefore, it makes eminent regulatory and commercial sense to auction the entire spectrum in 2100 MHz band, along with the proposed auction of 900 and 1800 MHz bands in February 2015.

Realignment of spectrum in 2100 MHz band : Contiguous dual carriers can support higher data rates and deliver a superior broadband experience to end users. It may be noted that globally contiguous spectrum blocks have been assigned to operators for greater efficiencies. It would therefore be advisable to realign and harmonize the current assignments so as to ensure that all those operators who win the second carrier in any circle are assigned a contiguous block of 10 MHz. This coordination and harmonization of spectrum requires a definite plan from the government and determined regulatory action for a well-coordinated and smooth redistribution of this spectrum band. Such an approach could benefit all stakeholders and spur growth of mobile broadband in the country. NIA documents of earlier auctions (3G/BWA and 1800/900 bands) also had following clause supporting change in allocation to achieve harmonization –

“The Government reserves the right to change the frequency allocation at any point over the duration of the relevant licences where this is required for harmonising bands and promoting spectrum efficiency.”

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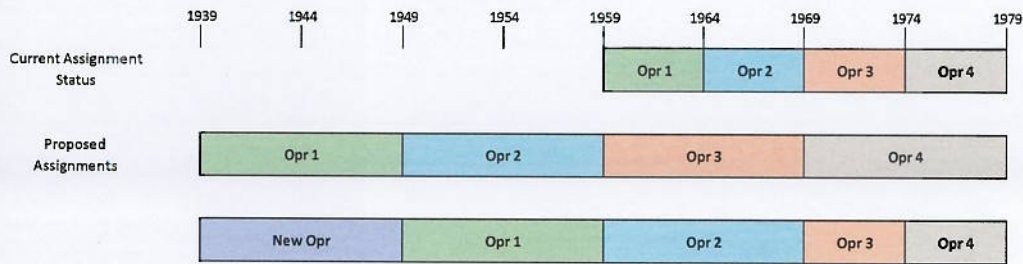


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Figure given below indicates this redistribution.



We will be delighted to provide additional inputs to this task of manifest national importance.

Sincerely,

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