

To  
Shri Arvind Kumar,  
Advisor (NSL)  
Telecom Regulatory Authority of India,  
New Delhi-110002

**Subject:** Response to TRAI Consultation Paper No. 63/2013 on "Permitting Trading of Spectrum in India"

Dear Sir,

It is evident from various Telecom Policies & Regulatory documents available in the public domain that Telecom Spectrum will henceforth be distributed by means of an Open Auction only. Also the Union Cabinet moved to [Refer 08-Nov-2012, Release by Union Cabinet] levy one time Charges on Spectrum not obtained in an Auction by various Telecom Service Providers (TSPs). Thus this implies a level playing field for whatever spectrum various TSPs hold or acquire in future.

In this backdrop, I'm of the view that **Telecom Spectrum Trading should be permitted in all Spectrum bands in India** as early as possible. There are more merits in letting TSPs trade and reconfigure networks to reach wider population with bouquet of telecom services than to inhibit them by just making them stick to whatever is being allotted or won in the auction.

In my view, the underlying theme in establishing Spectrum Trading Platform should be restricted to enhance telecom services and should not serve as M&A or exit route to TSPs. Telecom Spectrum Trading will entail - Pricing & Government Fees, Sizing of Blocks, Minimum Holding Threshold by TSP after Selling, How to Avoid Cartelization, etc It is in the best interest that a separate consultation paper be brought with specific questions on how to proceed with the Spectrum Trading platform in India.

In conclusion, **TRAI must recommend the DoT to permit Spectrum Trading** and seek further time on framing guidelines as this will guide prospective participants in the auction about the progressive nature of reforms India is willing to take in the aftermath of the scams and scandals that paralyzed the economy.

Thank You for the time and consideration.

Sincerely,

Chetan S Patil

