

28 March 2012

Shri Sudhir Gupta,
Pr. Advisor (MS),
TRAI,
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg,
New Delhi - 110002

Subject: Counter Comments on Consultation Paper on Auction of Spectrum

Dear Sir,

Further to my response to pre-consultation stage paper by TRAI I reiterate my concerns as a telecom subscriber on this subject. Various stakeholders have given their comments on the issues for consultation. But the issues pertaining to subscribers have not been adequately addressed as these were not specifically asked for in this paper. The main concerns of the subscribers are tariffs and competition in the sector. Availability and quality of service are other issues which are relevant to a subscriber.

However, issues pertaining to tariffs and competition have been separately taken care of by TRAI in another consultation paper by the Economic Regulation division viz. Review of Policy of Forbearance in Telecom Tariffs. Various stakeholders including me have given their views while responding to the issues for discussion in this paper. **These views should also be considered while formulating the policy for auction of spectrum.**

In every business all input are also a cost to the consumer; many a times over at that. Telecom is no exception. Rs. 1.76 lakh crores are wonderful, but as cost to consumer; not so wonderful. **Hence, it is important that subscriber centric concerns are clearly spelt out in the bid document / auction guidelines.**

Even at the cost of repeating I will restate in this submission that 'per second pulse rate' be standardized and specified for mobile segment to avoid overcharging. It will not only be futile but improper to do so after the auction.

I have gone into great detail about subscriber related concerns in my comment / counter comments to recent consultation papers by the Economic Regulation division. I reiterate those and the initial submission for pre-consultation paper. These may please be taken as my submission for this as well.

With regards,

Wg. Cdr. Anil Nag (Retd.)
37, Gail Apartments,
B 9/1, Sector – 62,
NOIDA – 201309 Tel: 0120 2403100 / 098680 71898