



India Cellular & Electronics Association
7th Floor, Le-Meridien Commercial Tower,
Windsor Place, New Delhi-110001

Tel +91 11 4934 9900
Email icea@icea.org.in Website www.icea.org.in
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**Shri Akhilesh Kumar Trivedi,
Advisor (Networks, Spectrum and Licensing),
Telecom Regulatory Authority of India
Government of India
New Delhi**

Subject: ICEA's submission on TRAI's Consultation Paper on the Auction of Radio Frequency Spectrum in the Frequency Bands Identified for International Mobile Telecommunications (IMT)

Dear Shri Akhilesh Kumar Trivedi,

Greetings from India Cellular & Electronics Association (**ICEA**).

ICEA, the apex industry body representing the mobile, IT hardware and electronics ecosystem in India, appreciates TRAI's continued efforts to strengthen spectrum management and the growth of India's telecommunications ecosystem.

We are pleased to submit our response, which is focused on the aspects related to the auction of the 6425-6725 MHz and 7025-7125 MHz bands. Our responses address Questions 14 and 15 from the consultation paper.

Question 14: Whether the spectrum in 6425-6725 MHz and 7025-7125 MHz ranges in the upper 6 GHz band should be put to auction for IMT in the forthcoming auction? Kindly provide a detailed response with justifications.

Response: India should defer any decision to auction the 6 GHz band for IMT until there is clear international consensus and market readiness. At present, device and infrastructure ecosystems for IMT use in the upper 6 GHz range (6425–7125 MHz) remain limited, and early licensing would risk fragmentation, high costs, and stranded assets. India should maintain licence-exempt access in the lower 6 GHz band (5925–6425 MHz) and possibly extend similar unlicensed use to all/part of the upper 6 GHz, for Wi-Fi 7 and future generations. This approach delivers immediate capacity and affordability gains across homes, schools, and enterprises while complementing existing 5G mobile networks.

A premature auction would isolate India technologically, as Europe and several major markets are still finalising their 6 GHz implementation strategies. Holding off until those decisions are complete will allow India to align its band plan with global norms, secure economies of scale, and benefit from mature device ecosystems. TRAI should therefore consider pausing any IMT allocation until global direction is settled and the IMT equipment supply chain stabilises, ensuring harmonisation and interoperability across borders.

Strategic timing also aligns with India's forward-looking spectrum agenda. India is already supportive of the "lower 7 GHz" band under WRC-27 Agenda Item 1.7, which may yield a more efficient, wider-channel plan for mobile broadband. Waiting for the outcome of WRC-27 will enable a cohesive, globally harmonized auction framework that delivers larger contiguous blocks and avoids mid-cycle reconfiguration. This patience will position India to lead in the 6G era rather than lock into a transitional 5G-only configuration.



Finally, deferring auctioning until after 6G release will ensure that India fully capitalises on the latest technology standards. A 5G-based deployment in upper 6 GHz now would require significant network upgrades within four years to accommodate 6G capabilities, leading to inefficiency and duplication of cost.

Question 15: In case you are of the opinion that the spectrum in 6425-6725 MHz and 7025-7125 MHz ranges should not be put to auction in the forthcoming auction, what should be the timelines for auctioning of this spectrum for IMT? Kindly provide a detailed response with justifications.

Response: We recommend that the auction for this spectrum should be conducted not before Year 2030. The justification is mentioned in the response to question 14 above.

Thank you for considering our inputs.

With my best regards,

A handwritten signature in black ink, appearing to read "Rajesh Sharma", with a long, sweeping horizontal stroke extending to the right.

Rajesh Sharma
Executive Director & Principal Advisor