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Ref.No.MAIT1125/183

18 November 2025

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Advisor (Networks, Spectrum and Licensing),  
Telecom Regulatory Authority of India

**Subject: MAIT counter submission to Q.15 of TRAI Consultation Paper on the Auction of Radio Frequency Spectrum in the Frequency Bands Identified for International Mobile Telecommunications**

Respected Sir,

***Greetings From MAIT!***

MAIT sincerely thank TRAI for inviting us to share our counter submission on the Consultation Paper regarding the 'Auction of Radio Frequency Spectrum in Bands Identified for International Mobile Telecommunication.' We value TRAI's ongoing dedication to effective spectrum management and fostering innovation and competition within India's digital landscape. We are grateful for this opportunity and are pleased to submit a response specific to Q. No. 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.**

**MAIT's response:**

MAIT requests to defer any decision to auction the Upper 6 GHz band for IMT until there is a clear international consensus and market readiness. At present, devices and infrastructure ecosystems for IMT use in the upper 6 GHz range (6425–7125 MHz) remain limited, and early auction of the Upper 6 GHz would risk fragmentation, high costs, and stranded assets.

We believe, TRAI should allow 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 pause any IMT allocation until global direction is settled and the IMT equipment supply chain stabilises, ensuring harmonization and interoperability across borders. Further, deferring auctioning until after 6G release will ensure that India fully capitalizes on the latest technology standards.

We kindly thank you for considering our submission and look forward to continued engagement with TRAI.

Warm regards,

Col Suhail Zaidi (Retd)  
Director General