To
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SUB: Comments on CP "Delinking of the license for networks from delivery of services by way of Virtual Network Operators" – Reg.
REF: TRAI Consultation Paper No. 15/2014, dated 5th December, 2014

A) DoT/TRAI/Telecom authorities needs to note:

- It seems, still India is running behind various foreign business models. This may be because the influence of foreign vendors/suppliers on our nation.   Our policy base to be **Indian Model.**

- The energies of Govt. employees/departments are to be utilized for better and meaningful out come to the Nation. For example, take the case of "Valuation of spectrum", whenever there will be an auction, a consultation paper will be released. Why that many consultations required? In this present case, many stake holders has expressed that " this is not right juncture" in pre-consultation, even then, still released a consultation paper to consume National Time.

- Compare India with equal sized countries, example: CHINA. Why, there is no mention about CHINA telecom model in consultation paper?

- "Staff required to TRAI on deputation", this is one of the main notification we found whenever we access TRAI web site. It is advised to keep regular staff instead of calling staff on deputation.

B) In this connection it is to **reiterate** that, the priority of Nation should be:

- Removal of multiple LSAs in the Nation and formulation of **National License** i.e. Country boarder should be the boarder of every telecom licensee.

- Reduction of maximum number of telecom operators to enable to allot more & continuous spectrum for better **quality delivery of services** by each National Telecom Operator.

- Migration of existing telecom operators in to new National License

- Mergers/ acquisitions to be allowed keeping in view of migration to "National License".

- MNP is already in place to migrate existing customers to respective operator, if requires.

- Terms and conditions of New National License should contain the clauses that ensure **100% coverage including every small / remote village with a time frame of 1 to 2 years.** As well as all existing terms and conditions of all existing telecom licenses should also to be modified with a spirit to ensure 100% coverage including every small/remote village with a time frame of 1 to 2 years by replacing "USO Contribution" clause.

- Introduction of **"spectrum non-utilization penalty"**, i.e. if an operator who are owning spectrum is not utilizing their spectrum (at least by 2nd year of allotment of spectrum) to delivery services in "x" number of villages / towns / etc, then that particular operator needs to pay penalty for non-utilization of spectrum in those "x" number of villages/towns/etc., This penalty to be in increasing order, i.e. the penalty of 2nd year should be double to be first year, and so on. Roll-out obligations under each licensing terms and conditions are to be modified to fit such above penalty.

- After full-filling all of above, **then, think** about Virtual Operations.

C) In this consultation paper, it is not able to identify our Nation's prime requirement. DOT/TRAI needs to work on the gaps that are existing in our present telecom echo system. In this juncture, the following is required to our Nation:

1) Establishing **Wireless Internet Zones (WIZ)** (Example: on Wi-Fi or White-Fi or etc. technology.) covering rural/remote villages, where local youth/entrepreneurs are to be included in establishing & running WIZs to provide internet/broadband facility to every person/end user who are carrying wireless enabled devices (ex: Wi-Fi enabled). **"Constraints to establish such WIZs due to present licensing/regulations to be addressed"**
   a. We may call such WIZs as "Virtual or Local Operations" with local access infra, who work on revenue share basis with available ISPs/telecom operators. The necessary frame work to be evolved to enable ISPs/Telecom operators to provide bandwidth/inputs to those local / WIZ virtual operations who further deliver services to end user.
   b. The broad and Multi-dimensional advantage of above zones are as follows:
      i. Involving local persons to establish WIZs instead of working under some MNC as an employee, i.e. similar to earlier "Cable TV" where lot of self-employment taken place. Rural youth/entrepreneurs will be motivated and feel ownership, which leads better quality delivery to end user.

ii.   National telecom operators need not to manage up to each door step and they need to simply provide "input" to the WIZ in that village. No capital / operations investment for such zones by telecom operators/ISPs, because it will be borne by local persons who are owning such wireless zone infrastructure.

iii.   In addition to Govt. offices, these WIZs will be one more client to NOFN outcome.

iv.   Assured access to every user in that village/town through their local provider.

v.   Nation's vision i.e. Digital India can be full-filled and can overcome Digital Divide forever.

vi.   Such WIZs will be the main ingredient / standard component in present "Smart Village" concept.

2)   Development of echo system for "National Internet"

a.   At present, internet access has no control over accessing National or International (i.e. just like STD calls or ISD calls controls in voice telephony). While accessing International, it requires the use of "International Connectivity", which leads more cost to the end user. But, many times, users may not require accessing International and likes to access only National, i.e., the internet resourses that are hosted in the Nation.

b.   In "National Internet" scenario, the users need not go beyond servers hosted in the Nation. For example: Train reservation, bus tickets, on-line banking, e-governance deliverables, local e-commerce/social networks, local e-learning, m-commerce, etc. This is possible without connecting to global links. This will reduce cost to individual to access internet. I.e. another nature of Virtual Operations in internet/broadband.

c.   Authorities needs to invest energies to evolve such Indianized echo system "National Internet" with required framework/regulations/licensing/IPRs, etc.

Hoping best utilization of National time and energies for a meaningful outcome

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