

TVR/COAI/086
8 June 2004

Shri P. K. Garg
Wireless Advisor
Government of India
Department of Telecommunications
Sanchar Bhawan
20 Ashoka Road
New Delhi – 110 001

Dear Sir,

Sub. : Review of National Frequency Allocation Plan 2002
Comments on the ABTO proposal for Additional Spectrum in PCS 1900
MHz (US) Band to CDMA Operators

This has reference to your letter No. J-16018/3/2003-WF of 11th May, 2004 vide which the Sub-Group has sought the comments of COAI on the “Note” prepared by the ABTO.

At the outset, we would like to submit that, in this Note, as agreed by the Sub-Group, ABTO was required to submit their detailed justifications on technical/techno-commercial grounds for additional spectrum and that too, specifically in the PCS 1900MHz (US) band rather than the 1800 MHz band already provided for in NFAP 2002.

However it is observed that the entire submission / **approach of ABTO has little technical substance and dwells mainly on commercial aspects to attempt to justify** their proposal to be allocated additional spectrum in the frequency band which has been clearly earmarked by NFAP 2002 for IMT 2000 services in line with ITU-R recommendations and widespread international practices. It could thus be concluded that there appear to be no technological justifications for the

CDMA operators to not implement their existing provisions in the current NFAP 2002.

For the above fundamental reasons, the ABTO proposal deserves to be rejected outright. However, we would on a positive note, like to raise the true technical and policy issues involved which warrant the rejection of the flawed and meritless proposal of ABTO. We enclose herewith our detailed submissions as below:

- Our Executive Summary is enclosed as Section -I.
- Our Detailed Comments on the Policy & Technological Issues that must be considered in this regard are enclosed as Section-II.
- Our Para-wise comments are enclosed as Section-III.

We do hope that our submissions will merit your kind consideration

Kind regards

Sincerely yours,

T. V. Ramachandran
Director General