



**PAKISTAN TELECOMMUNICATION AUTHORITY**  
**HEADQUARTERS, F-5/1 ISLAMABAD**  
**Ph: 051-9214243 Fax: 051-2878113**

**Re:**  
**Great Bear International Services (Pvt.) Limited**

**Enforcement Order under Section 23 of the Pakistan Telecommunication (Re-organization) Act, 1996**

File No. PTA/Wireless Licensing/LL and Mobile/WLL Rollout Plan/Network Roll out Plan of WLL Operators5/2006

Date of Show Cause:	20 <sup>th</sup> April, 2010
Date of Hearing:	6 <sup>th</sup> July, 2010
Venue of Hearing:	PTA HQs, Islamabad

**The Authority present:**

Dr. Mohammed Yaseen:	Chairman
S. Nasrul Karim A. Ghaznavi:	Member (Finance)
Dr. Khawar Siddique Khokhar:	Member (Technical)

**The Issue:**

“failure to roll-out and commence mandatory services in the assigned spectrum of 450 MHz in Ten licensed regions within the given time”

**Decision of the Authority**

**1. Brief Facts:**

1.1. **Great Bear International Services (Pvt.) Limited** (the “licensee”) is a licensee of Pakistan Telecommunication Authority (the “Authority”) vide Wireless Local Loop License No.WLL-13-2004 dated 8<sup>th</sup> November, 2004 and No WLL-17-2004 dated 28<sup>th</sup> September 2007 (the “license”) to establish, maintain and operate telecommunication system and to provide telecommunication services in Ten Licensed regions, i.e. **NTR-1, NTR-II, GTR, CTR, FTR, MTR, STR-I, STR-V, KTR** and **WTR** subject to the terms and conditions contained in the licenses (s).

1.2. As a licensee of the Authority, the licensee i.e. Great Bear International services (Pvt.) Limited is required to comply with the provisions of prevailing regulatory laws comprising of the Pakistan telecommunication (Re-organization) Act, 1996 (the “Act”), the Pakistan

Telecommunication Rules, 2000 (the “Rules”) the Pakistan Telecommunication Authority (Functions & Powers) Regulations, 2006 (the “Regulations”) and the terms and conditions of the licenses.

- (a). Clause 8.1 of the Appendix-B of the Rules and condition 3.1 of the license obliged the licensee to observe the provision of the Act, the Rules and the Regulations and to comply with all orders, determinations, directions and decisions of the Authority.
- (b). Clause 3.2.1 of the licences obliged the licensee to establish at least one Network Connection Point in each Licensed Region and commence the provision of Mandatory Services in each Licensed Region within (18) eighteen months from the effective date. In addition, clause 5.4 of Appendix – B of the Rules also provide that the licences shall terminate on the first anniversary of the effective date if the licensee has not before that date commercially provided licensed services or commercially operated the licensed system.
- (c). Clause 1.2.1 of Appendix-2 of the licence obliged the licensee that prior to 18 (eighteen) months from the effective date, and at all times thereafter, the licensee shall establish, maintain and operate in each Licensed Region identified in section 1.1.1 of Appendix-2, as part of its Telecommunication System, at least one (01) radio base stations that operate on the radio frequency spectrum assigned to licensee and described in Appendix-2, where the radio base stations are being used on a continuous basis to provide mandatory services on a commercial basis to at least five (05) customers.
- (d). the Authority, keeping in view the difficulties being faced by the Wireless Local Loop licensees, extended the operation of the aforesaid clauses of roll-out twice, *firstly*, vide its letter No.ROLLOUT (WLL)/WLL&M/PTA dated 29<sup>th</sup> June, 2006 upto 4<sup>th</sup> July, 2007 for a period of twelve (12) months and *secondly*, vide No.PTA/Wireline/Licensing/Statusof LL Industry/758/2007 dated 23<sup>rd</sup> May, 2007 for a further final period of twelve months, which expired on 24<sup>th</sup> May, 2008.

1.3. Section 23 (1) of the Act empower the Authority to issue show cause notice in case where a licensee contravenes any provision of the Act, the rules made thereunder or any term and condition of the license and in case it fails to satisfy the Authority or remedy the contravention, any of the punishments provided in sub-section (3) of section 23 of the Act may be imposed on it.

1.4. In the instant case the Authority took notice of the fact that the licensee has failed to complete roll-out and commence mandatory services in the assigned frequency spectrum 450 MHz in the aforesaid Ten licensed regions despite repeated instructions and directives of the Authority and in contravention of the license conditions, hence, it violated the aforesaid license conditions, therefore, it was issued a show cause notice (the “Notice”) dated 20<sup>th</sup> April, 2010 under section 23 of the Act, requiring it to remedy the contravention by completing roll-out in the aforesaid Ten licensed region in the assigned frequency spectrum immediately and also to explain in writing, within thirty (30) days of the issuance of the Notice as to why the license should not be suspended, terminated or any other enforcement order should not be passed against the licensee under section 23 of the Act.

1.5. The licensee replied to the aforesaid Notice on 20<sup>th</sup> May, 2010 through its counsel Mr. Ali Raza, Advocate, of AWAN RAZA, Islamabad, and denied the allegation in the following terms, which is reproduced as under:

***“In The Matter of:***

***M/s Great Bear International Services (Pvt.) Limited***

*Show Cause Notice No. PTA/Wireless Licensing/LL and Mobile/WLL Rollout Plan/Network Rollout Plan of WLL Operators5/2006//1/247 dated 20<sup>th</sup> April 2010 under Section 23 of the Pakistan Telecommunication (Re-organization) Act 1996*

***Reply on behalf of M/s Great Bear International Services (Private) Limited***

*We act for, and address you on behalf of M/s Great Bear International Services (Private) Limited (“GBIS”) in the matter of your Show Cause Notice No. PTA/Wireless Licensing/LL and Mobile/WLL Rollout Plan/Network Rollout Plan of WLL Operators5/2006//1/247 dated 20<sup>th</sup> April 2010 (“SCN”) whereby the Pakistan Telecommunication Authority (“PTA”) has sought its reply with respect to, inter alia, the alleged violations and contravention of Clauses 3.2.1 and Clause 1.2.1 of Appendix 2 of the WLL Licenses (“License”) as well as of the provisions of the Pakistan Telecommunication (Reorganization) Act 1996 (the “Act of 1996”), the Pakistan Telecommunication Rules 2000 (the “Rules”) and the Pakistan Telecommunication Authority (Functions & Powers) Regulations 2006 (the “Regulations”). We provide you with our response, as follows:*

*At the outset, we assure you that GBIS has always taken all possible measures to ensure full compliance to its license obligations as well as the Act, Rules and Regulations made thereunder. GBIS intends to explain the reasons for the delay in meeting the minimum roll-out obligations as required by Clause 3.2.1 and Clause 1.2.1 of Appendix 2 of the WLL licenses granted to it by PTA. It is submitted at the outset that GBIS established its network points in order to meet its roll out obligations for ITR, RTR, HTR and LTR for which it was granted Commencement Certificates by PTA.*

***Preliminary Objections:***

- 1. That GBIS established network points in order to meet its roll out obligations for ITR, RTR and LTR for which it was granted Commencement Certificates as early as March 2008, GBIS was at the time in the process importing infrastructure equipment for the remaining 11 regions which included MTR, CTR, GTR, KTR, FTR, HTR, NTR-I, NTR- II, STR-V, STR-I and WTR. Further, on 4.7.2008, GBIS fulfilled its roll out obligations for HTR as required by PTA therefore highlighting GBIS’s continuing efforts at meeting rollout obligations for all 14 telecommunication regions. These roll outs took place while most of the remaining industry was seeking additional time from the Authority to comply with the roll out obligations.*
- 2. That GBIS had envisaged rolling out as soon as it was granted licenses by PTA. This can be evidenced by the fact that it entered into a Supply Contract with Huawei Technologies (“Huawei”) on 15.4.2005 (which was amended on 16.12.2005 and 30.12.2005) whereby Huawei was to supply infrastructure CDMA equipment to GBIS which GBIS intended to utilize in order to meet its roll out obligations. However, Huawei failed to provide the specific equipment*

*as ordered by GBIS and resultantly some of the said equipment could not be fully utilized by GBIS for purposes of a proper roll out. This issue led to a dispute between the parties which is currently still pending before the civil courts in the form of two cases titled GBIS v, Huawei (Suit No. 276 of 2009) and Huawei v. GBIS (Suit No. 281 of 2009).*

3. *That PTA, vide its communications provided that roll out obligations were to be fulfilled by GBIS by or before 25.4.2008. It is submitted that GBIS completed its minimum roll out obligations for ITR, LTR and RTR within the time stipulated by PTA in March 2008. It is further submitted that GBIS was transferred licenses from DVCom on 12.2.2008 for MTR, CTR, FTR, HTR, NTR-I, IMTR-II, STR-V, STR-I AND WTR regions after which within a month on 26.3.2008, it provided documents to PTA for allocation of numbering series so that it could immediately thereafter be able to commence WLL services in the same regions.*
4. *That GBIS issued a letter to PTA on 21.5.2008 informing the Authority of its position with regard to roll out of its network for the remaining 11 regions i.e. NTR-I, NTR-II, HTR, CTR, GTR, FTR, MTR, STR-I, STR-V, KTR and WTR. It is submitted that GBIS at the time was proceeding in an expeditious manner as it had already installed BTS units in all the 11 remaining regions i.e. despite the same licenses being transferred to it just a few months prior. Furthermore, GBIS was actively pursuing Pakistan Telecommunication Company Limited ("PTCL") to lease out its domestic private leased circuit ("DPLC") to GBIS so that the company could establish network points for the remaining 11 telecom regions. GBIS at all times kept PTA fully informed as to the status of DPLCs and PTCL's incessant delays providing the same to the company so that it could fulfill its necessary roll out obligations.*
5. *It is submitted that despite the time constraints imposed by PTA, GBIS was successful in establishing a network point and successfully rolled out in HTR which can be evidenced vide its letter to PTA dated 4.7.2008.*
6. *That GBIS continued its full efforts to roll out in the remaining 10 regions however it was met with unforeseen circumstances in 2009 when its access to BTS sites was closed by Modaraba AI-Mali ("MAM"). MAM entered into an agreement as per Section 27A of the Act of 1996 whereunder GBIS was permitted to share access to BTS sites with MAM for which MAM attempted to charge an exorbitant "rent" which is otherwise illegal in view of GBIS's legal rights under Section 10 of the Telegraph Act 1885. When GBIS stopped making the said illegal "rent" payments, MAM took highly unreasonable and arbitrary action and shut down GBIS's access to BTS sites which led to the company being forced, through no fault of its own, to suspend its commercial operations and consequently became unable to roll out in the remaining regions.*
7. *That GBIS has already filed a complaint under Section 4(f) of the Act read with Regulation 31 of the Regulations with PTA on 7.4.2010 with regard to MAM's unlawful conduct against GBIS for which it has not yet received a response from the Authority. It is submitted that PTA has a duty to its license holders to ensure that their rights are protected as licensees. It is apparent that PTA is failing to fulfill its responsibilities towards GBIS by not taking any action against MAM for its*

*unlawful conduct thereby highlighting that the interests of valid licensees are not protected.*

8. *That GBIS, despite being unable to access its BTS sites, was able to fulfill roll out requirements for Peshawar, Multan, Sahiwal, Faisalabad and Gujranwala and issued a letter to the Authority on 25.1.2010 informing it of the same and further requested PTA to schedule its testing so that Commencement Certificates could be issued. PTA, however, informed GBIS, vide letter dated 8.2.2010 refused to process GBIS's request on the grounds that the Authority had suspended its licenses for nonpayment of PTA radio frequency spectrum fees. PTA, in its letter dated 8.2.2010 made reference to its enforcement dated 12.9.2009 in accordance with which it had suspended GBIS's licenses. It is pertinent to note, however, that the same enforcement order, in addition to allowing GBIS time to pay the radio frequency spectrum fee in installments, contained the unreasonable requirement of providing post dated cheques for the installments due. Upon GBIS's failure to provide post dated cheques, PTA suspended its licensed and ordered that it vacate its frequency spectrum vide its letter dated 22.1.2010. This led to GBIS instituting a Writ Petition before the Hon'ble Lahore High Court, Rawalpindi Bench which was pleased to order in interim that the operation of PTA's letter dated 22.1.2010 suspending the company's licenses be suspended provided GBIS pays its dues to PTA. It should further be noted that GBIS has since made the necessary payments in installment due to which its licenses were restored as per the Orders of the Hon'ble Lahore High Court. However, GBIS's request dated 25.1.2010 to be granted Commencement Certificates for its completion of rollout obligations in Peshawar, Multan, Sahiwal, Faisalabad and Gujranwala has not yet been entertained and PTA's refusal to carry out the inspection in terms estops the Authority from now attempting to initiate action against GBIS for failure to roll out as such delay has in fact been caused by the actions of the Authority itself.*
9. *That furthermore GBIS intends to complete its roll out obligations for the remaining regions but has been unable to do so due to the force majeure events of MAM refusing to allow access to its BTS sites and additionally the Authority's decision to suspend GBIS's licenses and refusing to inspect the sites which were ready and prepared. It is respectfully submitted that the circumstances described in the foregoing paragraphs have acted as unforeseeable delays hindering GBIS's efforts at completing its roll out obligations.*
10. *The Authority has in the past and continues to grant extensions to different license holders in terms of completing their roll out obligations. Hence proceeding against GBIS for such delay while not all others amounts to a discriminatory act which is not permissible under the law and the Constitution of the Islamic Republic of Pakistan, 1973.*
11. *That in view of the foregoing paragraphs, this SCN is misconceived as it does not take into account or make reference to GBIS's dispute with MAM in view of which the company was refused access to its BTS sites and further PTA's own action of suspending GBIS's license vide its letters dated 12.9.2009 and 22.1.2010 respectively and furthermore refusal to inspect and certify the sites which were ready for roll out. It is therefore submitted that there has been no default as such by GBIS as alleged in this instant SCN as GBIS has been making full efforts to fulfill its*

*responsibilities of rolling out. Additionally it is submitted that imposing penalties on GBIS for its inability to roll out due to the Authority and third party's interference in its effort would be unfair and contrary to the GBIS's rights as per the Act, Rules and Regulations.*

**Parawise Reply:**

1. *That the contents of para 1 are a matter of record and therefore are considered correct.*

2. *That the contents of para 2 are a matter of record.*

3. *That the contents of para 3 are a matter of record.*

4. *That the contents of para 4 are a matter of record.*

5. *That the contents of para 5 are a matter of record.*

6. *That the contents of para 6 are not accepted to the extent that PTA should have the unfettered right to withdraw spectrum and cancel the licenses of license holders if they fail to meet roll out obligations within the time stipulated. It is submitted that GBIS at all times has kept the Authority fully informed of its position regarding its roll out obligations and to threaten adverse actions against GBIS in such a situation would amount to an abuse of the responsibility of the Authority which is to protect the interests of the licensees,*

7. *That the contents of para 7 are misleading as they do not take into account GBIS keeping PTA fully informed as to its circumstances due to which it was unable to fulfill its roll out obligations. Furthermore, GBIS informed PTA that it was prepared to roll out in Peshawar, Multan, Sahiwal, Faisalabad and Gujranwala and requested PTA to conduct its necessary testing and issue commencement certificates which request was refused by the Authority itself.*

8. *That the contents of para 8 are misleading as GBIS informed PTA that it had fulfilled the necessary prerequisites for rolling out in Peshawar, Multan, Sahiwal, Faisalabad and Gujranwala and requested PTA to conduct its necessary testing which request was refused by the Authority itself.*

9. *That the contents of para 9 are correct to the extent that GBIS was unable to roll out in the 10 regions of NTR-I, NTR-II, GTR, CTR, FTR, MTR, STR-I, STR-V, KTR and WTR by 24.5.2008. However it is submitted that imposing a hefty fine or suspending GBIS's licenses would only cause major losses to GBIS as it is actively working to fulfill its rollout obligations. To impose penalties on GBIS due to third party interfering with GBIS's business objectives would be contrary to Section 6(a) of the Act which requires the Authority to ensure that its licensee's rights are duly protected.*

*It is submitted that on the basis of the above contentions of GBIS an and further detailed submissions and consideration of record PTA may either withdraw this SCN or cancel the same without any further action thereon as being misconceived. It is further submitted that there has at no point been an outright denial by GBIS in terms of proceeding with roll out and the company is ready and willing to meet its roll out obligations subject to PTA support with regard to removal of the interference and issues created by third parties and PTA inspecting and certifying the sites which are ready for roll out as intimated to PTA.*

*It is further submitted that GBIS may be afforded an opportunity of a hearing so as to respond in detail to the contents of the SCN if PTA refuses to withdraw the same.*

*In view of foregoing submissions, it is prayed that the SCN dated 20 April 2010 being unfounded, misconceived and untenable under the Act, the Rules and Regulations may kindly be withdrawn without any further action thereon."*

## **2. The Hearing:**

2.1. Since the licensee's reply was not satisfactory, hence, prior to issuing any enforcement order the licensee was required to appear before the Authority on 6<sup>th</sup> July, 2010 vide Hearing Notice dated 17<sup>th</sup> June, 2010.

2.2. On the said date the licensee appeared before the Authority through Mr. Ali Raza, Advocate, and Mr. Kamil Khan (CEO). The licensee reiterated the same facts as mentioned in its detailed reply and requested to withdraw the show cause notice. When the Authority confronted it with the question that how much time it require to complete its roll-out, it replied that in five regions it will be ready very soon and in all regions within about six to eight weeks or upto September, 2010. The Authority instructed the licensee to submit its proposal in writing within three days regarding its roll-out in ten licensed regions. The licensee submitted its response vide letter dated 21<sup>st</sup> July, 2010 in the following terms:

*"In consideration of the difficulties put forth by CEO GBIS, the Authority, as a very special case, had very kindly agreed to allow time till 30 September, 2010 for mandatory rollout of the network in left over ten telecom regions namely; KTR, FTR, MTR, GTR, STR-I, STR-V, NTR-I, NTR-II & WTR.*

*Ever since then we have been working extensively to meet the time line stipulated by the authority.*

*Salient actions to be taken in this regard are as under:*

- 1. Seven of ten BTSs presently collected at NTC sites shall be relocated to Wordlcall sites as explained in the attached spreadsheet.*
- 2. Above is planned to be completed by end of August, 2010. There after PTA shall be requested to schedule its tests to verify the minimum rollout obligations for issuance of Commencement Certificates.*
- 3. As regards KTR (Karachi Telecom Region) we intend commencing services under the White Labeling Agreement (WLA) with WTL as already provided to your good office. This can be done within minimum possible delay; by 31<sup>st</sup> July, 2010. Kindly confirm when is it convenient for PTA KTR Regional Office to test and verify our white label rollout so that Commencement Certificate is accordingly issued.*

*Above is subject to availability of funds by our ex-patriate chairman and amicable resolution to the legal cases with Modarba Al-Mali and others being presently contested in various courts."*

## **3. Findings of the Authority:**

- (i). Clause 8.1 of the Appendix-B of the Rules and condition 3.1 of the license obliged the licensee to observe the provision of the Act, the Rules and the Regulations and to comply

with all orders, determinations, directions and decisions of the Authority. Clause 3.2.1 and 1.2.1 of Appendix 2 of the license, as already reproduced in para 1.2 above, required the licensee to complete roll-out and provide mandatory services within eighteen months which was extended upto 24<sup>th</sup> August, 2008, but the licensee failed to complete roll-out in the aforesaid ten licensed region (NTR-I, NTR-II, GTR, CTR, FTR, MTR, STR-I, STR-V, KTR and WTR) in the assigned spectrum of 450 MHz within the given time despite repeated directions of the Authority, hence, contravened the aforesaid license conditions for which action under section 23 of the Act can be initiated, therefore, the allegation leveled in the show cause notice is established.

- (ii). the arguments of the licensee relating to closure of sites by Modarba Almali (MAM) and refusing access to its BTS sites by MAM and terming it as force majeure, are irrelevant in the instant matter. The instant show cause notice was issued due to failure to complete roll-out and commence mandatory services in aforesaid Ten licensed region in the assigned spectrum of 450 MHz, which neither has any nexus with MAM, as alleged, nor it provided any evidences in support of its claim. Without conceding the aforesaid, if this argument is accepted even then it does not go in favour of the licensee because the deadline for roll-out was expired on 24<sup>th</sup> August, 2008 whereas its sites were closed by MAM in December, 2009.
- (iii). the contractual dispute with third party (Huawei) has no precedence in the subject matter. The licensee has to complete roll-out obligation and to provide mandatory services pursuant to the clauses mentioned in the license. It is on the licensee to get its disputes resolved on early basis or find alternative solutions to avoid non-compliance of license conditions and directives of the Authority.
- (iv). the licensee's request dated 20<sup>th</sup> January, 2010 (which was received in PTA on 25-01-2010) regarding inspection of five regions, i.e., Peshawar, Multan, Sahiwal, Faisalabad and Gujranwala was disposed of as having not been processed due to suspension of its licenses at that time (i.e. 22<sup>nd</sup> January, 2010) and was accordingly informed to it vide letter dated 8<sup>th</sup> February, 2010. However, after restoration of its license, vide letter dated 22<sup>nd</sup> February, 2010 in the light of High Court orders dated 29<sup>th</sup> January, 2010, it has not applied afresh for inspection and issuance of commencement certificate for the said five regions.
- (v). the licensee failed to establish that the Authority is taking discriminatory action against it by issuing show cause notice due to failure to roll-out as per the license condition. Conversely, the Authority has taken serious action against its licensees who had not completed roll-out within the given time and consequently suspended/terminated their licenses.
- (vi). Regarding Licensee's assertion as to filing of a complaint dated 8<sup>th</sup> April, 2010 under Section 4(f) of the Pakistan Telecommunication (Re-organization) Act, 1996 read with regulation 31 of the Pakistan Telecommunication Authority (Functions & Powers) Regulations, 2006 by it and PTA's failure to act in aid of its responsibilities under section 6 of the Act to ensure that rights of licensee are duly protected, is vehemently denied. The aforesaid complaint was examined and was found incomplete, hence, the same was returned to the licensee vide letter dated 24<sup>th</sup> May, 2010 for providing specific contravention and grievances alongwith detailed information as required under the said regulation so that legal action, if required, may be initiated, but the licensee has neither responded to the aforesaid letter nor filed fresh complaint as per procedure, which



showed its disinterest to pursue or agitate its alleged grievance before the Authority. Instead, the licensee has filed Writ **Petition No 2641 of 2010** which is pending adjudication before Lahore High Court, Rawalpindi, Bench, hence, the Authority is unable to comment or give its findings on the aforesaid issues being *sub-judice* before the aforesaid Court to decide.

- (vii). Its intention to commence services in KTR (Karachi Telecom Region) under the White Labeling Agreement (WLA) with WTL, as alleged in Para 3 of the aforesaid commitment, the Authority has already evaluated the aforesaid arrangement/agreement and conveyed its serious objections/observations on the said arrangement vide its letter dated 16<sup>th</sup> April, 2010 and yet has not received any response from the parties after lapse of more than three months which showed their disinterest to pursue the same with the Authority, hence, the same arrangement cannot be linked in the subject proposal for completion of roll-out obligation.
- (viii). Since the licensee has committed during the hearing that it will complete its roll-out in the aforesaid ten licensed regions in the assigned spectrum of 450 MHz by the end of September, 2010 and also provided its commitment vide letter dated 21-07-2010, therefore, the Authority intends to take a lenient view of the matter for this time. However, the statement mentioned in its letter dated 21-07-2010 to the extent “*Above is subject to availability of funds by our ex-patriate chairman and amicable resolution to the legal cases with Modarba Al-Mali and others being presently contested in various courts.*” is not accepted on the ground that it is the responsibility of the licensee to complete roll-out and commence mandatory services as per its license which cannot be attributed to any reason including availability of funding, approval for WLA and resolution of its disputes with its contractors/lessors, etc.
- (ix). Though the licensee has given commitment to complete roll out by 30<sup>th</sup> September, 2010 with some conditions which are not agreed to by the Authority, therefore, keeping in view the nature of the order the Authority is going to pass in the matter and its consequences, the Authority has decided to give three months more time as proposed to the licensee to complete the roll-out obligations and to commence mandatory services in the aforesaid licensed region in the assigned spectrum.

#### 4. Order of the Authority:

- 4.1. The foregoing shows that the contents of the aforesaid show cause notice stand proved, however, taking into consideration the practical difficulties being faced by the licensee and positive attitude shown by it during hearing and the commitment to complete roll-out by 30<sup>th</sup> September, 2010, the Authority took lenient view of the matter this time and hereby disposes the aforesaid show cause notice by passing the following order under section 23 of the Act:
  - (a). M/s. Great Bear International (Pvt.) Limited is hereby directed to complete roll out obligations and commence mandatory services by fulfilling all requirements in its aforesaid ten licensed regions in the assigned spectrum of 450 MHz on or before **31<sup>st</sup> December, 2010** and submit compliance report to the Authority accordingly.
  - (b). In case of the licensee’s failure to comply with Para 4.1 (a), above, in letter and spirit its respective licenses No. WLL-13-2004 dated 8<sup>th</sup> November, 2004 and No

WLL-17-2004 dated 28<sup>th</sup> September 2007 for Ten Licensed regions, i.e. **NTR-1, NTR-II, GTR, CTR, FTR, MTR, STR-I, STR-V, KTR** and **WTR** shall **Stand Suspended w.e.f. 1<sup>st</sup> January, 2011** without further notice till further orders of the Authority.

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(S. Nasrul Karim A. Ghaznavi)  
Member (Finance)

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(Dr. Khawar Siddique Khokhar)  
Member (Technical)

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(Dr. Mohammed Yaseen)  
Chairman

Signed on \_\_\_\_\_ of August, 2010 and comprises of \_\_\_\_ pages