

Spectranet Comments on TRAI Consultation Paper 1/ 2011 on Telecommunications Infrastructure Policy

Overview of Telecom Infrastructure

6.1 Do you agree with the classification of infrastructure elements described in this chapter? Please indicate additions/modifications, if any, particularly where you feel that policy interventions are required.

Yes. IP1 should be allowed to install & operate all kind of active telecom & IT equipment. IP1 and Licensed Telecom service Providers should be able to share infrastructure with all Licensed Telecom service providers.

6.2 What measures can be taken to encourage more ILDOs and ISPs to set up cable landing stations?

No Comments.

Internet Exchange Point

6.3 Do you perceive the need for effective Internet exchange point(s) in the country to efficiently route domestic IP traffic?

Yes, it is surely beneficial to have Internet Exchanges in each state capital. This will help in lesser latency and better service to users as Content available in the state would be accessed faster and with better QOS. Relevant content being availability improvement will also help many local entrepreneurs to start new business. For country like ours, where each state is large and has lot of information specifically useful and relevant to state citizens.

6.4 If your answer to issue in 6.3 is in affirmative, please comment on the licensing framework of the entities for setting up Internet.

National Internet Exchange of India (NIXI) should be asked to open exchanges in each state capital. It is also desirable for all service providers of that state to interconnect with NIXI. The Service providers should be incentivized such that NIXI interconnection costs including local loop costs are less than costs from other service providers. Along with such cost benefit, there should be penalties on those service providers, who do not connect or delay or interconnect with insufficient bandwidth. Further all service providers should announce all IP routes being used by them.

Exchange Points in India

6.5 Will it be desirable to permit those Unified licensees to setup IP exchange points in the country who have no vested interest in routing of the IP traffic?

No. There should not be any duplication & only NIXI should be supported. No other organization should be allowed to set up any IP Exchange.

Mobile Virtual Network Operator

6.6 Please give your comments on the changes proposed in para 3.5 of Section C of Chapter 3.

Agreed.

In- Building Solutions

6.7 What methods would you propose for reduction of the number of towers?

It is suggested to reserve separate spectrum in 900 /1800 / CDMA bands for In-building applications to take out the load on outdoor BTSs capacity in urban and dense urban areas. .

This is already practiced in UK and Netherlands.

Right of Way

6.8 In what ways do you think that IBS can be encouraged for better in building coverage, better QoS and reduction in level of radiated power from Macro cell sites?

Local administration should make it mandatory while approving/clearing the construction of new facilities, such as multiplexes, malls, hotels, and recreational facilities etc. to facilitate IBS inside the facility and take an undertaking from identified Service providers to ensure execution of IBS in such facilities

6.9 How can sharing of IBS among service providers be encouraged? Does TRAI need to issue any guidelines in this regard?

Service providers should be incentivized.

Distributed Antennae Systems

6.10 Do you agree that innovative technologies such as 'Distributed Antenna System' (DAS) can be effectively utilised to reduce number of towers and migrate towards tower-less cities?

DAS should be encouraged to be used.

6.11 What are the impediment in adoption of new technologies such as DAS and how can these be removed?

DAS technology to be implemented in a disciplined coordination between all private and public departments.

Standardization of Tower Design

6.12 Would you agree that the design of towers can and should be standardised?

No Comments

6.13 If yes, how many different types of towers need to be standardised?

No Comments

6.14 What are the important specifications that need to be included in these standards?

No Comments

6.15 Which is the best Agency to standardize the tower design?

No Comments

Reducing Visual Impact of Towers

6.16 What is the likely cost of camouflaging the towers?

No Comments.

6.17 Can camouflaging be made mandatory? If so, can this be made part of the design standards of the towers?

Yes, it should be made mandatory. It should not be part of the tower design.

Clearances From Local Authorities

6.18 Do you consider that the existing framework of different civic authorities to grant permission for telecom towers is adequate and supportive for growth of telecom infrastructure?

The existing frame work is not suitable.

6.19 Is there a need to set-up a single agency for approval and certification of towers? Is there an existing agency that can do this work? If a new agency is proposed, what should be its composition and framework?

No need for a single agency. It should be the responsibility of the Municipal corporation, in the same way, as they approve the building plans.

6.20 Is it feasible to have a uniform framework of guidelines including registration charges, time frame, single window clearance etc for granting permission for installation of telecom towers and lying of optical fiber cables? If so, can it be prescribed by the Licensor or the Regulator?

There should be uniform framework including Right of Way for laying of Optical Fiber Cables and single window clearances for all licensed service providers

6.21 What can be an appropriate time frame for grant of permission for erection of towers?

No Comments

6.22 How can a level playing field be ensured for telecom service providers vis-à-vis other utility service providers especially in reference to tower erection?

No Comments

6.23 Which agency is best suited to inspect the buildings and certify the structural strength of the buildings in case of roof based towers?

No Comments

Infrastructure sharing

6.24 Should sharing of mobile towers be mandated?

It should be incentivized and not mandated.

6.25 Should sharing of active infrastructure, created by themselves or infrastructure providers, be allowed?

Yes, sharing of active infrastructure created by IP1 and Telecom Service providers should be permitted among all Licensed Service Providers.

Use of USO for rural areas

6.26 Please comment on the issues raised in paragraph 5.6 of Section A of Chapter 5.

We agree, that no action should be taken by Government on the recommendations made on 19th March 2009.

Instead of auction, Subsidy should be available to all telecom service providers with compensation to be fixed by predefined norms and operated by an independent agency.

IPV6

6.27 What measures are required to encourage the deployment and adoption of IPv6 in the country?

Government should make IPv6 test bed available so that end to end IPv6 traffic can flow.

This would reduce IPv6 rollout time as well as help all Service providers as all need not spend time/cost to learn about IPv6 connectivity.

6.28 In your opinion, what should be the timeframe for migration to IPv6 in the country?

Once test bed is available , ISPs would themselves find benefit in quick rollout. Any timeframe mandating is not desirable.

IPTV

6.29 What measures do you suggest to enhance provision of IPTV services by various service providers?

The regulation should create framework of Content being available including regulated prices to IPTV providers. There should be clear guidelines among Broadcasting, Telecom, Cable licenses to facilitate this.

6.30 Should there be any restriction on ISPs for providing IPTV services?

There should no restriction on ISPs for providing IPTV services. There should be uniform conditions for Cable operators, ISPs and other service providers. Only serious service providers should be allowed.

General

6.31 Please give your comments on any related matter not covered above.

For the proliferation of the Broadband, government should de-license additional frequency bands i.e , about 150 MHz in 3 GHz (2900-3050 Mhz and about 200 MHz in 5 Ghz (5070- 5150 MHz) bands.