

Date: 30th January 2012

To,

Shri Sudhir Gupta, Pr. Advisor (MS), TRAI,  
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From :

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**Subject:** Comments on TRAI Consultation Paper No. 9/2011

"Allocation of Spectrum Resources for Residential and Enterprise Intra-telecommunication Requirements/ Cordless Telecommunication Systems (CTS)".

Dear Sir,

DSP Group, India welcomes the opportunity to respond to the above referenced consultation paper. DSP Group®, Inc. (NASDAQ: DSPG) is a leading global provider of wireless chipset solutions for converged communications at home. Delivering system solutions that combine semiconductors and software with reference designs, DSP Group enables consumer electronics (CE) manufacturers and service providers to cost-effectively develop innovative revenue-generating applications with fast time to market.

At the forefront of wireless semiconductor innovation and operational excellence for over two decades, DSP Group provides a broad portfolio of wireless chipsets integrating DECT, Wi-Fi, PSTN and VoIP technologies with state-of-the-art application processors. With a growing share of the wireless home telephony market, the Company provides comprehensive solutions supporting all major digital cordless technologies worldwide.

DSP Group serves a broad customer base including leading CE brands, original equipment manufacturers (OEMs), original design manufacturers (ODMs), telecommunications operators and service providers. Enabling converged voice, audio, video and data connectivity across

diverse consumer products – from cordless and VoIP phones to home gateways and connected multimedia screens – DSP Group proactively partners with CE manufacturers to shape the future of converged communications at home.

DSP Group has positioned itself as market leaders in DECT products at various geographical locations like Europe, USA, Korea, Taiwan, Latin America, Brazil, Thailand and Japan. All the above countries use different carriers.

Leveraging the market leadership, DSP Group has significantly contributed to CAT-iq standardization. CATiq Golden device and many products are now based on DSPG chipset solution.

DSP Technology India Pvt. Ltd is headquartered in Bangalore and is actively pursuing research and development activities in the DECT technology.

DECT does not require any “frequency planning” and hence it is very useful in the private space and having it “de-licensed” will encourage the end user to utilize this technology.

DECT in India paves way for such technological advancement which other countries are already enjoying.

While in idle mode, “No Emission” mode could be turned ON to reduce the electro magnetic pollution in the environment. This aspect is not brought out in the present paper.

While in the talk mode, various dynamic transmit power control mechanism could be applied to reduce the electro magnetic pollution and also current consumption thereby improving the battery life. The radiations are so less that it is currently used technology for “Baby monitoring” in developed nations.

#### **Recommendations:**

**DSP Group India welcomes the move to de-license the 1880-1900 MHz or 1910-1920 MHz band for low power CTS applications. We believe that DECT is NOT a threat to any other technology (GSM, IMT 2000 etc ) and it can co-exist well with the current technology spread. We believe DECT will revolutionize the local communication both in urban and rural areas of India.**



## Issues for Consultation

### **3.1 Whether the current allocation of spectrum for CTS is sufficient to meet the requirements? If not, then how to meet the demand of cordless telephony spectrum requirements?**

A: DSPG believes that the current allocation of 1880-1900 MHz is sufficient to meet the CTS requirements.

### **3.2 In view of the availability of cellular mobile services in the country and possibility of Fixed Mobile Convergence (FMC), is there any need to have DECT Phones?**

A: Yes, there are places within the house where the mobile services are hard to achieve. DECT can bridge this gap and help achieve the wireless connectivity at the last leg.

### **3.3 Is there any requirement of allocating spectrum for digital CTS, in view of similar solutions being available in already de-licensed band 2.4 & 5.8 GHz?**

A: It is already proved that existing 2.4 GHz system has problems while a microwave is ON in the same area. De-licensing the 1880-1900 MHz will be an easy solution for this nagging problem.

### **3.4 Whether de-licensing of the spectrum for digital CTS applications will be the right path?**

A: De-licensing in the private space is a simple answer. Implementing the licensing regime in the private space is not practical at all. We have already seen the success of 2.4 GHz de-licensed for data applications where the customer can buy "off the shelf" and start using the equipment. We believe that this move will definitely increase the demand for wired-line from BSNL/MTNL and bring in good revenues for the Govt. Also, DECT provides a cheaper solution than 2.4GHz system due to bigger volumes and worldwide coverage.

### **3.8 Will there be any potential security threat using CTS? If yes, how to address the same.**

A: NO. DECT provides a higher level of security than GSM. GSM provides only mobile part authentication where as DECT does have mutual authentication procedures. The Encryption keys are generated fresh for every call and done periodically within the same call itself providing a very high level of security.

**For DSP Technology India Pvt Ltd**



**Mehul Mehta**

**VP and India Site Manger**