

RJIL/TRAI/2023-24/346

20<sup>th</sup> March 2024

To,

**Shri Akhilesh Kumar Trivedi,**  
**Advisor (Networks, Spectrum and Licensing)**  
**Telecom Regulatory Authority of India,**  
Mahanagar Doorsanchar Bhawan,  
Jawaharlal Nehru Marg, New Delhi - 110002

**Subject: RJIL's counter comments on TRAI's Consultation Paper on "Assignment of Additional Spectrum to Indian Railways for its Safety and Security Applications".**

Dear Sir,

Please find enclosed the counter comments of Reliance Jio Infocomm Limited (RJIL) on the Consultation Paper dated 07.02.2024 on **"Assignment of Additional Spectrum to Indian Railways for its Safety and Security Applications"**.

Thanking you,

Yours Sincerely,  
For **Reliance Jio Infocomm Limited**

**Kapoor Singh Guliani**  
Authorized Signatory

**Enclosure:** As above

**Reliance Jio Infocomm Limited's counter comments on TRAI's Consultation Paper on "Assignment of Additional Spectrum to Indian Railways for its Safety and Security Applications" dated 7th February 2024.**

1. Reliance Jio Infocomm Limited (RJIL) thanks the Authority for giving us the opportunity to respond to stakeholders' comments on the Consultation Paper on '**Assignment of Additional Spectrum to Indian Railways for its Safety and Security Applications**'.
2. We have had the opportunity to go through the responses submitted by the various stakeholders including those of Indian Railways and NCRTC and have understood the position of these bodies.
3. At the outset, we reiterate our submission there cannot be an iota of doubt that suitable radio spectrum is required for setting up safety and security applications along the network of Indian Railways. Further, the evolving technology and the requirements of passenger safety, track-side communication, train and way-side telemetry, video surveillance etc. requires that at least an LTE based network (scalable of 5G) should be deployed to meet these requirements of Indian Railways.
4. We had also highlighted the importance of 700 MHz band for public and private networks and the utility and capability of this digital dividend spectrum. As submitted before this spectrum has high spectral efficiency and can be used to provide extensive penetration to 4G/5G networks, especially in rural and dense urban areas.
5. Further, considering the fact that the Union Cabinet has agreed to assign this spectrum to Indian Railways and there are no two opinions on the need of a state-of-the-art network for safety and security applications of Indian Railways, **it is submitted that the best option would be assign this spectrum for Railways and Public Protection and Disaster Relief (PPDR) for efficient and optimum utilization of spectrum and to ensure that the network leveraging this spectrum is built and operated by a professionally qualified service provider.**
6. We reiterate our submissions that in case it is decided that spectrum in 700 MHz band should be used, **the Authority should recommend a Common Service Provider (CSP) for meeting requirements of Railways, other associated bodies and PPDR services.** As we all know, the 700 MHz spectrum for Railways will remain vacant all across the country barring the railway tracks, stations and limited area around the tracks. **The CSP will be able to build a high class 4G/5G network using the same spectrum all across the country and would also ensure that all other Government agencies and first responders like police, ambulances and fire safety have access to this network.**

7. Thus, in effect the CSP will create a pan-India Public Protection and Disaster Relief (PPDR) network leveraging the spectrum assigned to Indian Railways and NCRTC. **The PPDR services will be supported on common un-modified mobile handset. The CSP will have its own core and all technical knowhows and interconnection with legacy networks. This will enable much superior and faster roll out at minimum cost to the Government and PPDR features such as Push to Talk services would also be made available. This common network by CSP will be available to Indian Railways and agencies like NCRTC for their core and security related operations and will simultaneously be available to all other First Responders and PPDR bodies.**
8. The network will be designed to give **preference to the extent of complete bandwidth to the first responders/designated person during disasters.** The CSP network can also be utilized by the Defence services, if required and the CSP will be free to monetize the free available bandwidth.
9. Like FirstNet in the United States, the CSP network will be an exclusive communication network for use of Railways and other First responders for Integrated Emergency communication and response system (“IECRS”). This will ensure the objective of efficient utilized of spectrum without any fragmentation of IMT spectrum and would simultaneously unburden the agencies like Railways from building their separate communication networks.
10. This implementation will be in line with other leading / secure public infrastructure built globally. The CSP can ensure that Railways and PPDR agencies can leverage the common infrastructure to deliver a seamless first response to any calamity or event.
11. **In view of the above, we request the Authority to recommend a CSP built and operated common network for Railways, PPDR services and other designated users.**