

To

The Principal Advisor (Network, Spectrum and Licensing)

TRAI HQ, Delhi

Subject: - Counter comments on consultation paper on "Approach towards Sustainable Telecommunications"

With reference to abovementioned subject, the following points are submitted for consideration please:-

1. Comments of TSPs and service organizations are on expected lines as that show scant regard for sustainability. In 2011 also, when consultation initiated for greening of telecom, industry lobbies treated it as an impediment in their operation and expansion plan. It took almost one and half year to persuade the telecom companies for submitting the carbon report to TRAI.
2. The submitted carbon reports were not open to general public and till recently released consultation paper nobody was aware of base year 2011 emissions. The submitted reports were not verified by third agency and claims made by TSPs to reduce emissions by 74% /50% are questionable.

Counter Comments

3.2 Need for auditing the carbon footprint of a telecom network by a third party auditor

As mentioned by all the independent stake holders, the telecom companies, infrastructure providers should declare their energy mix (share of renewable energy) and carbon foot print. **Third party verification of this should be mandatory and energy performance of telecom sites is to be monitored by web based monitoring system. Monitoring is to be taken care by TERM Cell, DoT.**

3.4 to 3.8. Approach for calculating the carbon footprint

Based on comment of researchers and academicians, for calculation of emission by use of grid electricity, the average T&D losses must be considered, therefore Emission Factor (EF) should not be less than 0.95. (Considering average T&D losses in India =23%).

Formula $0.0027 \text{ tCO}_2/\text{liter}$ should be used for calculation of carbon foot print from diesel.

Regards

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