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Tower and Infrastructure Providers Association

Tower and Infrastructure Provider Association (TAIPA's) counter comments to remarks made by other stakeholders in response to TRAI Consultation Paper No 1/2011 on "Issues related to Telecommunications Infrastructure Policy"

21 February 2011

1. **Comment:** In response to your question on standardization of tower design, that the design of towers can and should be standardized (Q6.12), some stakeholders have stated that:

   "Yes, it should be done immediately."

   Counter comment: We reiterate that the observations made by the authority in its consultation paper around tower design standardization are unfounded and incorrect. No telecom infrastructure is deployed without ensuring the structural safety, and in quite a few civic jurisdictions it is done only after taking clearances such as No Objection Certificate (NOC). Therefore, any efforts for standardization must ensure that the standards only define optimal functional specifications.

2. **Comment:** In response to your question on reducing visual impact of towers, should camouflaging be made mandatory (Q6.16 and Q6.17), some stakeholders have stated that:

   "Yes, it should be made mandatory. It cannot be made part of the tower design, because the camouflaging will depend on each site."

   Counter comment: As stated earlier, we do not support camouflaging of towers being mandatory. We must recognize that there are significant costs associated with camouflaging towers, which will have to be passed on to the operators by the telecom infrastructure providers, and it would lead to additional burden on the end-consumer.

3. **Comment:** In response to your question on clearances from local authorities, that the existing framework of different civic authorities to grant permission for telecom towers is adequate and supportive for growth of telecom infrastructure (Q6.18), one stakeholder has commented that:

   "The mushrooming growth of telecom towers in India is at the cost of public health."

   Counter comment: These assertions are not borne out by several recent investigations.

   In December 2010, premier engineering institutes in India carried out an independent study, specific to the Indian environment. The report on Electromagnetic Radiation Measurement at New Delhi was in compliance with International Commission on Non-Ionizing Radiation Protection (ICNIRP)

standards. The study revealed that the "Level of Radiation" from cellular base stations in Delhi fall hundreds of times below the international safety standards. International institutions like the World Health Organization, the British Medical Association, the ICNIRP and the GSM Association, have opined that there is no conclusive evidence of any health hazards due to radiation from mobile towers.

The operators are making their best efforts to educate the general public, however, the regulator positive public position will be extremely helpful in this direction. We would stress that there is a need to increase awareness of local authorities and consumer groups.

4. **Comment:** In response to your question on clearances from local authorities, is there a need to set-up a single agency for approval and certification of towers (Q6.19 and Q6.20), some stakeholders have stated that:

   "No need for a single agency. It should be the responsibility of the Municipal Corporation, to give approvals in the same way, as they approve the building plans. In fact in many states the law prohibits, any structure (pole or tower) of more than 5 meter height from the height of building approved."

   Counter comment: There should be a single nodal agency set up in each state, which grants these limited specific approval and certification, in accordance with the policy guidelines. The single agency could interface with local civic authorities in grant of very specific approvals for setting up telecom towers, such as certification of buildings" structural strength, or permissions to set up towers in certain sensitive areas such as defense cantonments, heritage sites, border areas, etc.

5. **Comment:** In response to your question on clearances from local authorities, which agency is best suited to inspect the buildings and certify the structural strength of the buildings in case of roof based towers (Q6.23), one stakeholder has commented:

   "Municipal Corporation should verify the approved structural engineer's certificate."

   Counter comment: We support that a government certified architect/civil engineer is best suited to inspect the buildings and certify the structural strength of the buildings in case of roof based towers. However, these inspections and certifications do not pertain to the structural strengths of tower, which are inherent in the designs.

6. **Comment:** In response to your question on infrastructure sharing, should sharing of mobile towers be mandated (Q6.24), some of the stakeholders have stated that:

   "Infrastructure sharing should be made mandatory."

   Counter comment: The sharing of mobile towers should not be mandated. An incentive based approach is more likely to be effective. However, approval for new towers could be made subject to there not being shareable capacity in existing towers.

   The infrastructure sharing model enables more efficient use of capital, reduces time to market for rollout, reduce tower proliferation, provides better coverage quality, and minimizes issues related to local authorities. Therefore market forces are already driving players towards effective sharing of mobile towers. A regulatory/ bureaucratic fiat is unnecessary.