TUG
TELECOM USERS GROUP INDIA

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30th January 2012

Shri Sudhir Gupta, Pr. Advisor (MS),
Telecom Regulatory Authority of India
Mahanagar Door Sanchar Bhawan
JawaharLal Nehru Marg (Old Minto Road),
New Delhi-110002

Subject: TUGI 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,

Telecom Users Group of India (TUGI) is an non profit non governmental membership organisation and registered as society under Society Act 1860, NCR Delhi in 1997, it is catering to the need of telecom users in India and work closely in association with International Telecom Users Group (INTUG) www.intug.net

Since 1997 TUGI has promoted users interest at the policy and regulatory level, Our mission is to ensure that users have access to affordable, interoperable telecommunications services and their respective tariffs and their voice is clearly heard wherever telecommunication policy or regulatory frame work are being decided. Our work has contributed materially towards continuing reductions of prices with Quality of Services and increasing competition in product and services. TUG India is a registered consumer organisation with Telecom Regulatory Authority of India and founding Member of Consumer Advocacy Group with TRAI.

We are very pleased to submit our response to the subject TRAI Consultation Paper as enclosed.

Thanking you,

Yours sincerely,

Anil Prakash
President

TUGI Response to TRAI Consultation Paper on CTS

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?

Answer: The current allocated spectrum for CTS in the 1880-1900Mhz band for digital CTS as indicated under para 2 of the Consultation Paper along with the earlier allocated 2.4Ghz and 5.8GHz WiFi bands, are sufficient for the immediate needs of residential consumers in India.
However the 1880-1900MHz band needs to be de-licensed for its effective use by consumers in India, as in the case of rest of the world. We appreciate very successful WiFi de-licensing policy of Govt. of India.

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?
Answer: To the best of our knowledge pico cell based cellular technology has not been offered to residential consumers in India by any operator in India. It is also doubtful whether the FMC technology could cater to the very large co-located residential needs without getting into interference problems. It also cannot offer the very high quality of voice that DECT systems offer and ease with which they can be bought from the open market and installed by residential/ SOHO and enterprise consumers without the need for radio planning etc. These systems can be easily integrated with the existing conventional PABXs and IPPABX-LANs, Secondly, residential/ SOHO and enterprise consumers would rather have their own control over equipment meant for in-house use. Into the future this will become all the more necessary as in-house security and control functions become very common. Pico cell based cellular technology cannot serve these needs.

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?

Answer: We understand that the quality of in-house voice service offered by DECT is much superior to WiFi based systems. We also understand that with the increased use of WiFi based equipment in the houses & offices there are interference issues with the WiFi cordless. We would prefer using the WiFi band exclusively for data broadband and having a separate band allocation for voice service. A choice of such segregation would be best for consumers in India.

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

Answer: Yes – ABSOLUTELY ESSENTIAL IN CONSUMER INTEREST. Consumers in India would only go in for a CTS technology which they can buy from the open market (off the shelf) and use easily without any lengthy licensing issues. Consumers in India are same as global consumers and if this technology is available as an open market de-licensed technology to global consumers there is no justification in Govt. of India keeping the technology under a license regime and deprive its use to the consumers.

3.5 Do you agree that the 1880-1900 or 1910-1920 MHz band (TDD Mode) be allocated for digital CTS applications? If yes, what should be the limits of emitted power (EIRP), power flux density (pfd), antenna gain etc?

Answer: The 1880-1900MHz band is already allocated for digital CTS technology (TDD Mode) vide NFAP-2011. However, for reasons best known to WPC it has been kept under a license regime, thus making it completely un-attractive as a usable technology for consumers in India.

Any standard specifications prevalent in Europe / USA / ITU may be used for the purpose.

TUGI Response to TRAI Consultation Paper on CTS

3.6 Do you see any coexistence issues between existing cellular systems using adjacent band with low power CTS allocations in 1880-1900 or 1910-1920 MHz band?

Answer: DECT systems are being used all over the world where cellular networks both GSM & CDMA are working. We have not heard of any interference issues with the cellular network & handsets.

3.7 Whether the de-licensing of either 1880-1900 MHz or 1910-1920MHz band for low power CTS applications will result in loss of revenue to the government?

Answer: In India the earlier analog CTS as well as 2.4GHz and the recent 5.8GHz cordless technology was allowed on a de-licensed basis in public interest, without any criterion of revenue earnings to the Govt. of India. We understand that all over the world wherever the spectrum is to be exploited as a commercial telecom service venture, it is licensed. Where the spectrum is for the larger good of the public and is to be used on a non-commercial basis it is not licensed. We, therefore, do not see the justification for revenue considerations in India in the case of digital CTS technology. We have also not heard of any country where CTS technology is licensed for earning revenue for Govt.
If Govt. of India feels that it is necessary to earn revenue out of this spectrum allocation, it could perhaps consider earning the revenue through standard sales tax etc. route rather than licensing every residential & enterprise installation of digital CTS. Furthermore, a licensing policy applicable to residential use equipment is practically impossible to implement. This will only encourage under the table sale of digital CTS systems without license as is presently going on in India and lead to revenue loss to the Govt. If the band is de-licensed it will encourage the users to easily buy the products over the table from the market (with no licensing procedures) and indirectly earn ***higher*** revenue for the Govt in the form of sales tax etc. It will also encourage local R&D and manufacturing and perhaps even exports from India, further enhancing the revenue earnings to the Govt. Furthermore, we understand the spectrum of 1880-1900MHz is in the unusable gap band between cellular systems and is likely to remain unused if not de-licensed. Therefore the Govt. of India is already loosing revenue daily due to non-use of the spectrum and shall continue to do so as long as the allocated band is not de-licensed.

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

Answer: DECT systems are connected to direct lines or PABX just like wireline phones/ headgear sets etc. We therefore cannot understand the security concern here. However, from a consumer point of view the digital CTS technology should have sufficient security to ensure that un-authorized users are not able to use the system or listen to the conversation.

3.9 Amongst the various options of digital technologies available to meet the cordless telephony requirements, either spectrum allocation can be considered according to technology or the etiquettes/ specifications can be defined for the de-licensed spectrum band. What method of allocation of spectrum for digital CTS applications should be adopted?

Answer: These are technical issues. As far as the consumers are concerned it should be ensured that whatever technology is permitted in the band should be low cost, low power, safe for human beings and does not create interference into residential systems of consumers located nearby.

3.10 Any other issue?

Answer: NIL