

To

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SUB: Comments on TRAI's "Consultation Paper on Delivering Broadband Quickly: What do we need to do?"

REF: TRAI's Consultation Paper no. 12/2014 dated 24.09.2014

Q-11:

Utilization of "**Over Head Optical Fibre Cable on Electrical poles going to GPs, i.e. villages**" instead of digging & laying plastic ducts, will reduce the cost of the project due to reduction of ROW, no need of purchase of plastic ducts. All the existing electrical over head alignments (poles) going to villages can be utilized by finalizing a nominal amount (keeping in view of Govt. to Govt. transaction) including the maintenance of OF Cable laid on their poles.

Not only cost, this method will save time of implementation of NOFN project. I.e. broadband can be delivery quickly as per the expectation of this new Govt. to achieve Digital India.

W.r.t Q6 (Page No. 50):

In voice telephony, it is segregated as "International Calls (ISD)" , "National Calls (STD)" & "Local Calls"

In similar way, we can introduce "National Broadband" & "Global Broadband" and develop Indian model of broadband echo system.

Here "National Broadband" means, the users need not go beyond servers hosted in the Nation. For example: Train reservation, bus tickets, on-line banking, e-governance deliverables, local e-commerce/social networks, local e-learning, etc. can have with out connecting to global links.

All these servers will follow the National rules/regulations/cyber rules/security concepts in addition to other National cyber policies such as not to host illegal content, pirated content, pornographic content, etc. in those National / Local servers. In this method, no need to utilize the International Gate ways, hence, cost for delivery of "National Broadband" will be reduced.

"Global Broadband" uses can connect all the servers irrespective of the location of they hosted around the globe, i.e present method.

Page No. 63

Here, it is mentioned that “It is common knowledge that decision-making processes in Public Sector Undertakings (PSUs) are cumbersome, time-consuming and often end in scrapping of a tender”, this perhaps keeping in view of performance of 3 PSUs i.e BSNL, RAILTEL and Power Grid. But, it is to be noted that “**BBNL also one of the PSU**, that too, newly formed in very recent past, with very less staff & infrastructure”.

Q 7 to Q10:

At this stage, inclusion of private operators / contractors (National or international) leads further complicating the present progress of NOFN. If included, finally every one show figures to other one.

As a fact, to manage their own organization, Rail-Tel / Power grid developed OF network and some spare capacity they are using for offering commercial purposes, but they may not having sufficient manpower/infrastructure & eco-system to implement NOFN to the interior Villages/ Panchayats. Hence, if they agree, they may be allowed to withdraw for implementing NOFN, but their spare capacity can be utilized for NOFN to connect specified GPs / villages with agreed commercial terms.

It seems, BSNL is only operator who is having own staff up to rural /interior areas as well who is managing telecom services even at difficult areas of the Nation. **Here, not only setting up of NOFN, but, it is to be maintained for continuous quality delivery of Broadband at those 2.5lakh Gram Panchayats.** Hence, the total project can be handed over to BSNL with strict & practical time frames and penalties.

Q-12:

Telecom infra, such as Tower, ducts, etc. shall be treated similar to other civic infra, such as Overhead water tank, drainage system, etc. Hence, the telecom towers, telecom cable ducts are to be included in the civic infrastructure developments which are to be build as a part of town/village planning, road/highway planning, etc.

Q22:

The basic support systems those are pre-requisite to manage telecom infra. at remote areas such as Village Gram Panchayats:

- 1) Electricity
- 2) Road
- 3) Public transportation
- 4) Telecommunications - Voice

Purpose of above is as follows w.r.t remotely located villages/Panchayats:

- 1) **Electricity** – For Powering the telecom infrastructure/devices
- 2) **Road** – To reach the village
- 3) **Public Transportation** – To transport the equipments and to perform travel by the technical persons to install & maintain the telecom infrastructure
- 4) **Telecom – Voice:** To have regular feedback on the working/guidance w.r.t operations & maintenance of telecom infrastructure.

Is, the authority/DOT ever tried to prepare the list of villages/Panchayats which are having/not having above pre-requisite support systems for penetration of Broadband in those 2.5lakh GPs?

Is, the authority/DOT ever tried with concerned Ministries/ State Govts. to have such support systems?

Is, the authority/DOT ever tried to fix the targets to any licensed telecom serviced provider/operators for penetration of Broadband in their respective jurisdiction? Or simply satisfied by receiving the penalty payment for not covering the delivery of services in rural/remote/villages/Panchayats in the name of USO fund and accumulating the same for spending in the name of NOFN project?

Better quality broadband through wireless mode is possible by:

- Evolving new National Telecom Licence by removing multiple LSAs. I.e entire nation will be in a single LSA.
- Reduction of maximum allowed telecom operators (with new National Telecom Licence) in the Nation, for allotment of **“more quantum & continuous spectrum”** for quality delivery of services.
- Stopping of further allotment of spectrum till completion of mergers / acquisitions in to the new National Telecom Licence to the limit of “reduced maximum allowed operators”.
- Inclusion of penalty clause for not utilizing the allotted spectrum to deliver telecom services in each village/Panchayat. (Unit: penalty per village)
- Evolving Indianized model for viable telecom operations in this Nation.
- To evolve safe collection / process of e-waste generated due ICT advancement / utilization.

In this consultation paper, every thing is bundled at one place in the name of “Quick Delivery”.

Time provided for furnishing feedback/comments is not sufficient, but here tried to suggest for **“Quick Delivery of Broadband for Rural/remote 2.5 lakh Gram Panchayats (Villages)”**, to support present Govt.s’ DIGITAL INDIA policy.

Hope the suggestions made will yield results in quick delivery of broadband.

Best of luck.

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