

महानगर टेलीफोन निगम लि.

(भारत सरकार का उद्यम)

Mahanagar Telephone Nigam Ltd.

(A Government of India Enterprise)



No. MTNL/RA/TRAI CIRCULAR/2015/PART

DT. 12.02.2015

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To

Advisor (CA & QoS)

TRAI, New Delhi

Sub : TRAI's draft "The standards of Quality of Service of Basic telephone service (Wire line) and Cellular Mobile telephone Service (Fourth Amendment) Regulations, 2014"

Sir,

In reference to TRAI's draft regulation referred in the subject matter issued on 28.01.2015, following comments of MTNL are submitted for kind consideration of the Regulatory Authority-

- i) Proper RF coverage is one of the most critical factors for maintaining / delivery of proper QoS in the case of Mobile Service. Considering the restrictions imposed by local authorities including various instructions issued by local courts and the public scare about radiation effects, day by day it is becoming difficult to acquire new cell sites. As a matter of fact, it is becoming a challenging task to keep live existing cell sites due to opposition faced from neighborhood area. In many cases we are forced /compelled to remove working cell sites leading to RF coverage deficiency in that pocket. Having made huge investment in acquiring spectrum, it is in interest of the operators and they have been making their best efforts in improving RF coverage; however, it is felt that it high time for Govt intervention in making sites available to the operators for erection of new cell sites (without any financial implication on Govt).
- ii) It is submitted that enough protection is available to take care the subscriber's/customer's interest through available alternatives and option for migration to other service provider alongwith existing number under MNP.

2.0 High Spectrum and other input costs coupled with challenges faced in acquiring cell sites are already making it difficult for the operators not only to make a viable business case from Mobile Services but also to maintain the QoS. As stated above, since enough protection is already provided for taking care of customer's interest, any further increase in financial disincentive for deficiency in QOS Parameters will be a counterproductive and will not be in the overall interest of the Sector. Accordingly, it is requested to continue with the existing scenario and the proposed referred draft regulation may kindly be withdrawn.


(Virender Prakash)

DGM(RA), MTNL CO

पंजीकृत एवं निगम कार्यालय : महानगर दूरसंचार सदन, 5 वां तल, 9 सी.जी.ओ. कॉम्प्लेक्स, लोधी रोड, नई दिल्ली-110003

फ़ोन कार्यालय : 24319020, फ़ैक्स : 24324243

Regd. & Corporate Office : Mahanagar Doorsanchar Sadan, 5th Floor, 9 CGO Complex, Lodhi Road, New Delhi-110003 India

Phone Off.: 24319020, Fax : 24324243

आप हमारे साथ हिन्दी में भी पत्राचार कर सकते हैं।