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Subject: Comments on consultation paper on Implementation Model for Bharatnet

To: kapilhanda@traf.gov.in

Dear Sir,

I am a recently retired senior officer of Department of Telecom. I have extensive experience in telecom network planning and operations, service delivery, commercial policy, regulation etc. I am not giving question by question reply. However, I wish to highlight some issues as below.

While it is good that Bharatnet proposal takes care some of the problem areas of NOFN, the issues regarding project implementation and operation need serious consideration.

One important point to take note of is that telecom network has to be an integrated unit at national level technically as well as administratively to enable it to follow uniform product standards and implementation of uniform policies for management, QoS, service delivery etc across all regions/LSAs.

If any implementation model breaks up the network planning, operation and management into different administrative domains, it will not be practically feasible to ensure achievement of objectives of the project in totality. Hence the question arises as to what measures are required to be taken to ensure delivery of objectives in totality if any such model is followed. Or the question should be as to what amendment is needed to the scheme of multi-stakeholder participation to avoid the above situation.

As far as participation by TSPs is concerned, there is no justification for having a separate network for 'Bharatnet' service delivery. Telecom network set up for this purpose will need to be connected to upstream network and natural choice is to connect to his own network. There is little value of standalone network established from DHQ downwards. Hence, there will no use of BOOT model at the time of transfer of the network to the government.

Therefore, their existing networks can be extended to do the needful. Secondly, though, VGF can be considered for such implementation, but due to highly capital intensive nature of project, variety of services which can be provided using the network and unpredictable demand, question arises as to how to arrive at a justifiable basis of benchmarking for VGF.

It is true that in the State led model biggest handicap would be to have enough competence within the government to handle the project even through SPV. Consultant based project design, procurement, implementation and operation will have its own and mostly known demerits.

Biggest bottleneck in project implementation today is right of way which delays infra creation. Partnership of state is necessary for this purpose. Hence, under certain joint command and control of Centre and State like SPV, passive infra can be created. Its maintenance with SLAs can be carried out by the same entity. For this funds and incentives can be provided from USOF. Active infra should be entirely under one command obliterating state level legal / independent administrative boundaries.

We should also review the policy of creating lean and thin organization disregarding the requirement of efficient organisational structure for activities like planning, procurement, testing of equipment and network for quality, monitoring, network management, service creation, service SLA maintenance, network fault rectification etc

If any clarification or details are required, I will be available for discussion.

Regards

A.K.Mittal