Comment on Consultation Paper number — CP05/2015 on Implementation Model for BharatNet

Question No	Comments
1	**Other Challenges with the three models** 1. **General** (a) Success of any project is based on :- (i) Motivation to build or execute the project in terms of efficient cash flow, hassle free path for project implementation (RoW etc in this case till the last mile GPs), commitment from user for unconditional support in eventualities beyond the control of executing agency. (ii) Short term and long term gain and associated RoI. (iii) Indirect advantages in other projects. (b) This network should be built as a social obligation initially without going for business model and define QoS figures (Availability) taking into account the CAPEX and OPEX together. Once this is achieved, then business model could be worked out based on spare fibre with change in QoS depending on market requirement. TRAI may define the QoS parameters. (c) TRAI should declare USO fund laid fibre as national infrastructure. 2. **CPSU led Model** (a) Existing PSUs in its present form have not proved to be efficient for implementation of such time bound and PAN India Project(e.g. NOFN I). Hence, a reorganization of CPSU capable of Handling Data Networks in the country needs to be carried out, with capabilities of EPC and operation and maintenance. This CPSU can be augmented by private players. (b) BBNL needs to have its empowered wings and limbs spread across states for faster implementation, efficient control and monitoring of the project and accountability towards public. (c) Assets to be owned by states so that it can be build, operated, maintained and upgraded based on specific and graded requirement of each state depending on its present socio-economical status and demography. (d) Annuity payment slows down the build up and growth of the network. Hence, at the most quarterly payment, if not monthly should be adopted to ensure efficacy and growth of the network in longer run. 3. **State Led model** (e) State led model if implemented under technical guidelines of the centre to facilitate seamless integration of the state implemented networks into a common Bharat Net controlled and Monitored through central NoC. (f) Content Development and Management can be outsourced to private parties for early activation and effective use of the network. 4. **Private sector Led** (g) This may lead to situations similar to large projects such as NFS, where the resources of bidders are stretched to almost breakdown points in case of delayed payments. This leads to delay in the implementation of the project.
2	The proposed models for implementation are viable and choice of model could vary state to state based on their present status of development.

3,4	(a) BOOT Model may not feasible in this kind of project where the life of the network may be 10-15 yrs only due restricted life of fiber itself, network prone to degradation due to repeated breakdowns and maintenance and hence, may not be in a states to be Transferred or economically viable. Hence, it may be only BOO model that will work. (b) Also, BOO or BOOT model with some minor contribution from user(Government) and major contribution from the Private party, on one hand will motivate private party to invest, build, operate and maintain the network and on the other hand force the government to rightfully control and monitor the progress of the Network. The shared revenue could be appropriately compensated for the Government by giving that much less to private party. (c) This arrangement will reduce CAPEX for private party
5	The project will be commercially viable to Executing Agency, only when it is executing such multiple infrastructure projects in the country and not providing services or content on this. Services and content on this could be provided by licensed operators only.
6	Yes there should be a cap on the number of states to bid by executing agencies. Not more than three to four states.
9	While flexibility for deciding route, construction and topology of the network will enable optimization, but flexibility in deployment of technology will pose integration of network at National level, compromise of public interest over business interest of implementing agency.
11	Incentives/disincentives should be correlated to revenue share.