

Kind Attn:Shri Banzal, Advisor(Networks,spectrum and Licensing)TRAI

Dear Sir,

First of all, thanks for releasing the consultation paper on Inbuilding Access by Telecom Service Providers(TSP). This discusses various important salient issues of Inbuilding solutions.

We,Kavveri Telecom Infrastructure Limited, an IP-1 registered infra provider, are one of the largest Neutral Host Provider for providing inbuilding solutions for large buildings like Malls,Hotels,Hospital and Commercial buildings across the country for the last over eight years. We have invested huge capex to build this network and share it with all the cellular carriers in India at a very reasonable cost. Before 2008, we were building the inbuilding solutions network each time for an operator thereby having multiple networks in the building which was a colossal national waste. Then we embarked on this neutral host model where we build the inbuilding solution network and share it with all the cellular operators whoever wish to join at a reasonable cost.

We would like to provide our comments on the Consultation Paper as below:

Issues for Consultation

1. Do you agree that there is a need to address the issues discussed in this consultation paper or the market is capable of taking care of these issues without having any policy intervention/guidelines in this regard?

Yes. The TRAI should provide specific guidelines for the commercial sector so that the cost of broadband deployment is most effective for the consumer. The market will not change by itself without these guidelines because it has developed this way without them.

2. How can sharing of telecom infrastructure inside a residential or commercial complex/airport/hotels/multiplexes etc among service providers be encouraged? Should the sharing of such telecom infrastructure be made mandatory?

The technology certainly exists for neutral host DAS(Distributed Antenna systems). We believe that there should be incentives to do so vs. a mandatory program in the beginning. **The paper does NOT reference public safety radio coverage**, which We believe should be mandatory for larger, high footfall properties. It also does not address the potential benefits of "smart buildings" in the areas of energy savings, smart grid, communications etc... Governmental incentives could be considered for smart building deployments with the DAS and Public Safety being integral to the program. The building owner realizes monetary benefits via compliance.

3. In view of the international practices given in para 18-23 of Chapter-II of the Consultation Paper, what provisions should be included in the National Building Code of India to facilitate unhindered access for all the TSPs?

The National Building Code of India should include provision as per the European model discussed in the Consultation Paper.

4. Any other option, which in your view, could resolve the issues discussed in this consultation paper?

Property tax incentives for the building owners that are based on expediency to resolve the issue, and expire after a certain period of time.

Tax incentives for the TSPs to join together in a neutral host environment that is measured by the amount of square feet build out over a specified period of time.

Government sponsored contests that reward “connected buildings and cities” to encourage development

Documents published that measure the economic savings/benefits to the building owners, TSPs and the consumer.

Sir, we are available for any further clarification or comments, if you desire.

Regards

Thanks and Regards,
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