



Vodafone's Counter Comments on TRAI's Consultation Paper on 'In-Building Access by Telecom Service Providers dated 6th June 2016

This is in respect of the comments of various stakeholders on the above consultation initiated by the Authority. We have gone through the response of various stakeholders on the above consultation initiated by the Authority and would like to make the following submissions in this regard.

1. We note that there is general agreement and support of the need for a framework around in building access for the facilitating the Digital India vision of the Government the development of Smart cities. We once again reiterate that we support this initiative of the Authority.
2. We support sharing, which should be encouraged and incentivised, but believe that it should be left to mutual commercial agreement as there would be several complexities involved in 'mandating' sharing.
3. We strongly disagree with the views of some stakeholders that 2-3MHz spectrum in the 900MHz and 1800 MHz band should be de-licensed and given for dedicated in-building use. It is submitted that:
 - Such a proposition is tantamount to creating license exempt access service providers which cannot be permitted
 - Both 900MHz and 1800MHz bands have been defined as access spectrum bands by the Government and can only be assigned to licensed TSPs, as per the allocation process decided by the Government
 - As access service licensees, it is the TSP alone that can best decide the optimal use of their assigned spectrum for macro or micro cellular use in order to best meet the needs of their subscribers. The newer solutions using Small Cells/Femto/Pico cells require a completely different infrastructure and that needs to be built as per TSP's requirement.
4. We believe that the scope of the IP-1 should be confined to setting up of passive infrastructure only. We note that in the context of setting up of active infrastructure, the IP-1 are recognizing that the same can be set up on behalf of a TSP only and that in such cases, the consent of the said TSP would be required for sharing the so set up active infrastructure. It is therefore submitted that even if IP-1s are allowed to set up active infrastructure, it should be maintained that the same can be on behalf of a TSP only.
5. We do not agree with the views of some stakeholders that UHF Band IV (470-585 MHz) and Band V (582-698 MHz) should be allowed /used for in-building coverage in dense urban areas. It is submitted that the value of this band is in its propagation characteristics and thus better suited for rural geographies.



6. We also not agree with suggestions that only neutral host IP 1 providers be allowed or incentivized to deploy both active and passive elements of telecom infrastructure in buildings. As submitted above, the role of an IP-1 provider is limited to passive infrastructure; active infrastructure can only be deployed on behalf of a TSP. Any exclusive approach could well lead to the same challenges being faced against the 'neutral hosts' as are currently there with respect to building owners. Moreover, neutral host IP 1 providers may not be able to/willing to invest in infrastructure that caters to the specific technical requirements of individual TSPs. We believe that an approach based on non-exclusivity, non-discrimination, fair, transparent and reasonable terms and mutual agreement will best achieve the desired end objectives.
7. The concerns raised on EMF aspects by some stakeholders are not correct and TRAI and DoT must issue suitable regulatory communications to the public to allay such concerns which can act as a hindrance in deployment of telecom infrastructure. Wireless in-building solutions like IBS are low powered deployments.
8. Deployment of active system IBS (which are more efficient but are costly) can be encouraged/facilitated by the Government by way of reduction in import duties (presently at 17.85%) and by suitable incentives for domestic production of such equipment.

28 July 2016

New Delhi