

**No.:135/TRAI/2017-18/ACTO**

**Dated: 4<sup>th</sup> December, 2017**

**Shri S. T. Abbas**

**Advisor (NSL)**

Telecom Regulatory Authority of India  
Mahanagar Door Sanchar Bhawan,  
Jawahar Lal Nehru Marg,  
New Delhi-110002

**Subject: ACTO's response to TRAI Consultation Paper No. 15/2017 dated 9<sup>th</sup> October 2017 on Next Generation Public Protection and Disaster Relief (PPDR) communication networks**

Dear Sir,

Association of Competitive Telecom Operators (ACTO) is pleased to submit its response to TRAI Consultation Paper on Next Generation Public Protection and Disaster Relief (PPDR) communication networks

We hope that our comments (enclosed as Annexure - I) will merit consideration of the Hon'ble Authority.

Thanking you,  
Respectfully submitted

Yours sincerely,  
for **Association of Competitive Telecom Operators**

**Tapan K. Patra**  
**Director**

Encl: As above

## **ANNEXURE-I**

### **ACTO's response to TRAI CP on Next Generation Public Protection and Disaster Relief (PPDR) communication networks (Consultation Paper No. 15/2017, October 9, 2017)**

ACTO respectfully submits these comments on the TRAI Consultation Paper on Next Generation Public Protection and Disaster Relief (PPDR) communication networks, issued on October 9, 2017.

#### **ACTO's response to the specific questions raised in the consultation paper:**

**Q.9 Please give your comments on any related matter not covered in this consultation paper.**

#### **ACTO's response:**

Flexibility is required under all the telecom licenses to manage network in the event of disaster due to any technical failure resulting in collapse of the network. A calamity cannot necessarily be natural to be termed and recognized as a disaster. For a TSP, any damage to its network impacting ability to efficiently manage and serve its customers is itself a disaster given the amount of investment made. It is imperative that the telecom operators should be permitted to operate from remote sites for a limited period till the time the network is up and running. This should be equally applicable to sites located outside India for remote access perspective. As per existing policy, all the sites requiring remote access permission from locations outside India needs to be prior approved. It has been noted that the turnaround time for approval is very high and time consuming. Therefore if the application for a site has been made to DoT and which is awaiting feedback or approval and has not been rejected, should be allowed to be turned up for a limited period till the damage due to disaster is repaired. The period can be defined and stated. However, the TSPs should not be stopped from not using remote / other sites in the event of a disaster (just because it is awaiting for feedback or approval).

Nothing can be more prized to a TSP than its network. So any damage to the network for any reason is itself a disaster for the TSP. Just like microwave sites are put in times of flood to

restore communication. Similarly TSPs should be allowed to temporarily utilize sites (in India or outside for remote access) in case of any disaster to the network due to any reason which results in impacting its ability to operate, manage and serve the customer.

The following can be considered:

- a) There should not be any requirement of pre-approval for RA in case of disaster situation and operators should be allowed to do time bound activity for network management. Though operator should be obligated to perform RA under the framework of current RA guidelines and all provisions should be followed including post intimation to DoT and submission of logs ( if required).
- b) In the event of disaster (Natural or otherwise pertaining to the network itself), TSPs should be allowed to do RA without any pre approval for any sites or DoT may consider sites which have been applied.
- c) Duration can be specified.
- d) Compliance requirements can be spelled out – for example providing data for the duration etc.

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