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Fwd: TRAI Consultation Paper on "Ease of doing Telecom Business in India"

Sanjeev Banzal,Advisor TRAI <advmn@trai.gov.in>   Tue, Apr 11, 2017 at 2:16 PM
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-------- Original Message --------
From: **Debshankar Sen** <debshankar.s@aryacom.com>
Date: Apr 11, 2017 10:35:46 AM
Subject: TRAI Consultation Paper on "Ease of doing Telecom Business in India"
To: advmn@trai.gov.in
Cc: 'Vivek Shukla' <vs@aryacom.com>

Shri Sanjeev Banzal,

Advisor (Networks, Spectrum and Licensing),

TRAI , Government Of india

New Delhi

Dear Sir,

Greetings from Arya Communications , New Delhi , India !!!

We introduce ourselves as one of the leading sales and service provider of Analog & Digital RF Communicators , representing one of the leaders in Telecom Two Way Radio industry, Motorola Solutions for nearly three decades in India. We are engaged with and cater all major Armed and Para Military Forces in India and Police Organizations as well.

In reference to your enclosed notification dated 14th March 2017 inviting inputs on "Ease Of Doing Telecom Business In India" we felt relevant to share our views being in business for years and in line with the forward thinking thought process of the Government to excel and ease out the process of doing Telecom business in India.

The leading area of challenges currently prevailing and a probable way out has been shared for your ready reference and due consideration.

Spectrum Allotment

Radio Trunking (CMRTS) networks are extensively used by State / City Police, Big manufacturing plants, Refineries, Coal fields etc for their communications needs. Licensing for Radio Trunking needs a lot of improvement in terms of ease of doing business.

Recommendations:

1. **CMRTS Agreement :** The present process for license/spectrum is quite lengthy, and complex without any fixed timelines for completion of each task. We would like to recommend that the process should be reviewed and made time bound.

    a. The application process is manual. It can be made electronic with defined timeline to review it and approve it in system else the same can be deemed approved. This would bring transparency and would reduce processing time.

    b. CS section handles agreements which are revenue generating in nature. CMRTS networks are used for public safety applications and hence no revenues are generated. Processing of CMRTS agreement should be under the purview of WPC and not CS wing of DOT.

2. **Assignment of spectrum by WPC for CMRTS:** Though the application process is on-line but still the process needs hardcopy submission and thereafter the entire process is not transparent, non-standard and arbitrary. The time taken to complete this process is also anywhere between 3 months to 9 months. Suggestions to improve this process are as below:

    a. Work may be done to make WPC application process **truly** on-line with no dependency on hard copy submission.

    b. The process should be clear and status of application should be visible on-line rather than desk to desk follow-up needed currently. This would bring transparency and would reduce processing time.

    c. Administrative allocation of spectrum for CMRTS users need to be streamlined and a clear policy be framed and enforced. Allocation of frequencies to Captive users / PMRTS operators get interrupted time to time and as on date also it is been stopped due extension of allocation was extended only for 6 months period on 4th August 2016 and it is expired on 3rd February 2017.

    In absence of frequency allocation, all of the users get effected and WPC also loose significant revenue against Spectrum charges and License fee. The allocation should be streamlined to avoid this inconvenience & revenue loss to WPC

3. Digitalization should be mandated by DoT for 2-way Radio Communication. Going Digital would result in adoption of Spectrally Efficient Technologies as well as provide integrated voice & data platform over a secure communication platform. There should be a cut off timeline for migration to Digital and no new licenses/renewal of Analog radios should be permitted.

4. Currently, public safety/policy agencies have to pay huge amount of money towards license/spectrum charges for deploying a two-way captive radio system.

    The two-way captive radio networks deployed by public safety/police agencies are non-revenue generating networks deployed for security and safety of the citizens and protecting national infrastructure.

    As such there is no case of spectrum exploitation by such users/networks. Such huge payments for license at the start and on recurring basis, affects the budget planning for police organizations and restrains them from upgrading their communication systems. Since state police organizations fall under State government, appropriate policy structure should be devised by DoT in consultation with MHA and State governments rather than using the conventional charging philosophy adopted for private wireless networks resulting in huge payments to be made by police agencies.

There should be Zero or Minimal charges levied only to recover spectrum/ administrative cost with an inter-ministerial arrangement in place.

5.   DoT should have separate spectrum demarcated for public safety/police agencies for Narrowband and Broadband in line with ITU recommendations for harmonized PPDR band. No other captive user should be allocated spectrum from this band. This is a common policy even in other countries worldwide.

6.   Police organizations need to deploy two-way captive radio systems to cover the entire city from the start with lowest number of sites so as to maintain lowest possible OPEX costs.

This results in high power RF sites radiating from very high towers reducing the chances of frequency reuse. Current practice of sanctioning 5 frequencies initially and then considering request for additional frequencies based on traffic loading cannot be applied to such public safety captive radio networks.

Such police wireless radio networks do not operate on philosophy of 'peak hour loading' as the case with Cellular, but rather "emergency hour or disaster hour" loading. These networks are designed based on emergency/crisis hours when the traffic can peak.

Recent Chennai & Kashmir floods are the right example, all commercial networks choked and it was the police analog radio network that really came handy to assist the operations within the city. In number of sites and spectrum terms, a high power captive radio system is able to cover a city in less than 10 sites using less than 500 KHz spectrum as compared to a cellular network deploying '000s of sites and more than 5 MHz of Spectrum.

DoT/WPC should allocate spectrum for police captive radio networks based on technical justifications submitted to fulfill coverage and capacity requirements.

7.   Current NFAP has USR (Short Range UHF Radio-4W) spectrum stated as 350-351 MHz. This is also referred as Easy Licensing' and typically used by small commercial agencies like personal security, event management, hospitals, hotels etc. The process for this 'Easy License' should be simplified and license should be released online against onetime payment based on the application submitted at WPC.

8.   Experimental license (Non-radiating) should be available on yearly basis rather than half yearly basis as of now. These radios are not used for any commercial purpose. These are used internally for testing, training purposes. The charges for such Experimental license should be optimized to a reasonable amount of Rs 250 for portable and Rs 500 for fixed/ base station per annum as compared to Rs 5000 for every transceiver which results in huge payments in lakhs of rupees towards Experimental license itself owing to large number of make/models of radios.

9.   As per DoT/WPC formula for calculating spectrum royalty charges, Category IV (25-60kms) price slab is considered irrespective of the technology and output RF power. Category IV implies an RF propagation distance range of 25-60 kms which is not required by small CMRTS users like Airports, Refineries, Steel Plants etc as they don't have an infrastructure presence in that much area. While computing the Royalty charges, the extent of operation should be considered and for such small CMRTS users, Category III (5-25 kms) should be used.

10.   The formula for Royalty charges includes a variable parameter of 'no. of radios'. This has a high weightage in the formula. With higher number of radios, even with same no. of frequencies, the Royalty charges multiply and become higher. Since License fee is anyways being charged separately on per radio basis, for portable, mobile and fixed station, this parameter of 'no. of radios' need to be relooked in the formula for Royalty charges. It can either be optimized or else a maximum limit be considered for this parameter in the formula.

11.   Evaluation for Spectrum Pricing and Spectrum Allocation should be aligned and not considered in isolation. On one hand DoT/WPC generally considers Cat IV (25-60kms) price slab for computing spectrum royalty charges. This means that it is being considered that for such high power BTS, the RF frequency will radiate upto such large distance and user is being charged accordingly. On the other hand, for the same application, TEC evaluation suggests lack of frequency reuse for distances even upto 30 kms and they seek traffic loading report to allocate more than 5 frequencies. If spectrum charge is being levied considering 25-60 kms RF propagation, frequency allocation should be done in line with same understanding given that frequency reuse is limited for such large RF overlapping coverage sites.

We look forward your re-evaluation on the above shared concern and hope our view would be considered favourably. Please feel free to connect us for any further clarity on the shared concern .You may write back at debshankar.s@aryacom.com or may connect at 09711311782 incase needed.

Warm Regards

Debshankar Sen

Additional General Manager

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New Delhi

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