

E Mail: ccsbng@gmail.com

Tel: 26713616

CONSUMER CARE SOCIETY®

593, 24th Cross BSK II Stage, Bangalore-560070

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President:	Secretary:	Treasurer
G S Gundu Rao	Ravindra Nath Guru	K C Aswathanrayana Setty
Tel.: 26717338	Tel: 26713616	Tel.26760610
	M-9845683220	

25th January 2011
Bangalore

The Chairman,
Telecom Regulatory Authority of India
Mahanagar Doorasanchar Bhavan
Jawahar Lal Nehru Marg
New Delhi -110002

(Attention: Mr Lav Gupta, Principal Advisor (TD) on the e-mail address: tdra@traf.gov.in
or tdra.traf@gmail.com.)

Dear Sir,

Subject: Comments on TRAI CP 1/2011 Consultation Paper No 1/2011 on Issues related to Telecommunications Infrastructure policy-14th January, 2011

1. Quoting from the Introduction of the CP-“Telecommunications has been recognised the world-over as an important tool for socio-economic development for a nation. It is one of the prime support services needed for rapid growth and modernization of various sectors of the economy. Apart from the direct contribution that the development of such infrastructure may have on an aggregate output, investments in these technologies are expected to have pervasive effects throughout the economy. “

2. Further, we see a nation-wide network of Roadways, Power-grid distribution systems, well functioning Indian Railways, aviation services, financial services, educational networks and so on. All this has been possible because of robust telecom services supporting them. Though we cannot be sure, it is our guess that the individual user telecom networks would be operating in the configuration of a strong country-wide back bone and the nodes on it on a Hub and Spokes or a closed loop or a hybrid or some other most suitable topography. They may not even be on dedicated transmission systems but on shared basis by utilizing the spare telecom capacities available from other transmission system owners.

3. While TRAI may be basically involved in the area of public telecommunication services, indeed it is necessary and essential for the telecom infrastructure being planned to be created for this to be fully aware of developments in similar telecom networks already in service in the country (or planned) for other users as it should also

harmonize and dovetail with and augment other telecom infrastructure services already in position.

4. The undersigned felt that it was probably the responsibility of Department of Telecoms to plan, and provide such supporting telecom infrastructure facilities required by other public services. With the above in mind we went through the Annual Report 2009-2010 of DoT. It mentions on pages 5 and 6

Extracts from Department of Telecommunications Annual Report 2009-2010, Page: 5 and 6

Broadband

Indian telecom market has still large untapped potential to grow further. With large population yet to have access to telecommunication and teledensity still being 48% and rural tele-density 21%, potential for the sector remains large especially in urban areas where wireline and internet services are yet to make significant inroads. Even the mobile services space, which has seen exponential growth in urban areas, has not reached the vast majority in rural areas. The focus of the stakeholders, is now shifting to these untapped rural areas which will provide engine for the second phase of the growth in Indian Telecom. Rural teledensity target is upgraded to 40% by 2014. There is talk about one billion telephones in the country by 2015. It is necessary to increase the broadband connectivity for the knowledge-based society to grow quickly and for reaping the consequent economic benefits. Several policies have been announced and implemented to promote broadband in the country (Box 3).

- As a result of these measures, the broadband subscribers grew from 0.18 million in 2005 to Th 6.2 million as on 30 April 2009 and about 7.98 million, at the end of the December 2009.

- **Broadband connectivity has been provided in 4044 cities, 5431 block headquarters, 613 district headquarters covering about 1,06,559 villages.** (highlighting by us)

Broadband coverage will get fillip with the sitting up of 100,000 Common Service Centers (CSCs) covering all the villages in the country. As on November 2009, 26,239 CSCs have been covered. They will provide internet excess and benefit of e-governance to the common citizen.

- It is also envisaged that internet and broad-band subscribers will increase to 40 million and 20 million, respectively, by 2010.

- India faces technological as well as commercial challenges in penetration of broadband.

- The low PC penetration and affordability issue due to high cost are the main causes.

- The wireless broadband is likely to be the preferred route that many operators adopt in delivering broadband services to the masses of the country. Wireless technologies have capabilities to provide widespread broadband access and could drive inclusive growth by way of mobile banking, tele education, E-governance, tele medicine etc.

- To achieve the stipulated target, the government has issued guidelines for Broadband Wireless Access (BWA) Services. Introduction of BWA services will enhance the penetration as well as growth of broadband subscribers. Wi-Max has also been making headway for penetration of wireless broadband connectivity across all the sectors

5. We have also noted from the above Annual Report :

OFC Based Project for Defence Services:

Name of the Project: OFC Project for the Armed Forces for release of Spectrum

High Level monitoring Committee: A high level Monitoring committee under the chairmanship of Cabinet Secretary is reviewing the progress of the work. In the second meeting of the high level committee, chaired by Dr.Sam Pitroda on 12/11/2009 has directed that the OFC project

should be implemented as Mission-mode project with CMD BSNL as the Mission Director and one representative each from MoD and DoT.

6. From the above it appears that DoT/BSNL are already implementing broadband projects across the country for defence services. May be there are similar projects being done or already completed for other agencies.

7. We totally agree with the statement in CP “ What telecom is to economy telecom infrastructure is to telecom services. Adequate infrastructure becomes the bedrock for reliable telecom services. Telecom service providers have always faced the challenge of matching their technology and infrastructure to the customers’ demand cycles”

8. We feel it is necessary to get a correct and complete picture of the present status of the nation-wide broad-band systems from DoT as well as other prominent Broadband user communities. This would enable assessment of the spare capacities which may be available in them over a period of say next 2 to 3 years so that by appropriate administrative and technical coordination it becomes available for this TRAI envisaged network usage till its own dedicated system becomes operational. It would be a win-win situation for all. While this suggestion seems attractive on the face of it, it will require a lot of work in convincing every one involved of its merits, which we are sure TRAI can do successfully.

9. It is also necessary to look for alternatives to provide quickly the needed broadband connectivity to telecom service providers to enable quick roll out of various value added services. This is possible only by utilizing the existing but unutilized capacity of installed broad band system capacities.

10. Therefore we suggest TRAI to get maximum information on DoT’s **• Broadband connectivity has been provided in 4044 cities, 5431 block headquarters, 613 district headquarters covering about 1,06,559 villages** as well as details of nation wide wideband communication networks being used by various infrastructure providers as this would help all in planning and implementing the proposed TRAI broadband medium to create new network infrastructure for 3G and Broadband Wireless Access. A robust telecom infrastructure is indispensable for providing reliable services to the consumers.

We have no other observations on this CP.

Regards

G S Gundu Rao
President, CCS, Bangalore