

July 07, 2022

To
Shri Asit Kadayan
Advisor (QoS)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawaharlal Nehru Marg, New Delhi 110002

Subject: Counter Comments on Consultation Paper on 'Rating of Buildings or Areas for Digital Connectivity' dated 25th March 2022.

Dear Asit Ji,

In addition to DIPA's comments already submitted on Consultation Paper on the subject, please find enclosed DIPA's counter comments on Consultation Paper on 'Rating of Buildings or Areas for Digital Connectivity' dated 25th March 2022.

Thanks & Regards,
For Digital Infrastructure Providers Association (DIPA)



T R Dua
Director General
New Delhi

DIPA's Counter Comments to TRAI Consultation Paper on "Rating of Buildings or Areas for Digital Connectivity"

1. At the outset, we are thankful to TRAI for giving us the opportunity to provide our comments and counter-comments to the TRAI Consultation paper on **Rating of Buildings or Areas for Digital Connectivity**.
2. Digital Infrastructure Providers Association (DIPA) has submitted its comments to the questions raised in the above Consultation Paper. Further, we have also gone through the submissions of various stakeholders on the above said consultation paper. We note that some of the stakeholders have commented that there is a need to define the DCI related responsibility of the building owner and introduce new professionals, with delineated responsibilities, who should be involved during planning, design, and construction of building to deliver the requisite DCI for IBS. Further, it has been stated that Although PMs should be allowed to appoint an IP in case they want to, in which case the IPs should be working on behalf of PMs for upgradation of DCI in the building. Hence, both the models of ownership by the PMs and co-ownership with the IPs may co-exist, depending on what is more suitable for the PM.
3. We submit that our **counter comments are restricted to these limited points only and we take this opportunity to reiterate the role played by existing IPs-1 in building the telecom infrastructure that can be used for public/private communication networks** for the customers. Our issue wise counter comments are as below.

Role of IPs-1

4. The telecom industry worldwide is following the trend of infrastructure sharing as a business process to keep their investments low and to compete for the economy of scale. According to the Best Practice Guidelines for Enabling Open Access adopted by the 2010 Global Symposium for Regulators, open access is defined as “the possibility for third parties to use an existing network infrastructure.” Various other definitions do exist, but there seems to be agreement that open access applies to infrastructure and means that all suppliers are able to obtain access to network facilities on equal terms.
5. The Open Access business model is now winning ground globally as governments and municipalities find the concept of offering competition between providers and the freedom of choice for the subscribers. It has also proved to be a feasible way to connect rural areas where service providers might have a hard time generating enough revenue to justify investing in their own network infrastructure
6. IPs-I have played a significant role in making affordable telecom services available in India right since the year 2000 when the concept of Infrastructure Providers came into existence. The deployment of shared tower infrastructure by IPs-I led to rapid growth of mobile networks. Over the years, the telecom tower industry in India has emerged as a trendsetter in the infrastructure sharing.
7. Since the IPs-1 have responsibilities towards Licensed Telecom Service Providers for ensuring necessary QoS, the builders should engage with IPs-1 to create neutral infrastructure to cater to multi TSP services viz. BMS, IoT, etc. Also, it is suggested to have a single rollout done for multi operator service environment (Neutral host). This will avoid repetition, bring efficiencies and better network utilisation.

Need to introduce a special class of Infrastructure Providers to create, operate and maintain DCI for a building or cluster of buildings

8. As per the DoT website a total of 1276 IPs-1 were registered as on 31 March 2022. Contrast this with the relatively few TSPs presently in the country. The IPs-I as per their registration with DoT are those infrastructure providers who provide assets such as Dark Fibre, Right of Way, Duct space, and Tower on lease/ rent out/ sale basis to licensees of telecom services on mutually agreed terms and conditions. With evolving times most of the major IPs-1 have added In Building Solutions (IBS) to their portfolio and have teams of specialist designers and engineers for implementing IBS solutions.
9. The IP-1s of today are quite competent & capable of designing & deploying Digital Communication Infrastructure (DCI) in the country as they have the necessary competency and capability and hence should also be permitted to design, implement & evaluate the DCI along with the new entities envisaged in the new framework. The creation of new eco-system should not dismantle the current effective system and sharing should not be a lost opportunity.
10. The right type and amount of telecom infrastructure is necessary for providing a variety of telecommunication services based on emerging technologies with desired Quality of Service. Besides timely availability of telecom services, one of the most important factors is that the choice of TSP should remain with the consumers. **The entry of TSPs in premises is dependent upon the wish of the builder/developer/RWA. The speed of deployment is often hindered by building owners / building developers due to delay in negotiations or demand for exorbitant rents.** At times, in-building telecom infrastructure is setup by a TSP or an IP-I through exclusive commercial agreement with the builder/developer /Resident Welfare Associations (RWA). Due to restricted access to the premises, the residents of the building are not able to avail the telecom

services of the TSP of their choice; their choice is limited to the TSP(s), who could get the access to the building after entering into a commercial settlement with the builder. Thus, the residents get deprived of the benefits of competition. **This is one of the drawbacks of the present system.**

11. Those in charge of managing buildings often consider the need for an IBW or mobility solution but fear the technology is too costly or complex – and do not act on it. They may be halted by the perception of requiring complex engineering – or worrying that they do not possess a clear understanding of radios and the cabling technology associated with this type of network. Concerned by the prospect of ‘yet another rip and replace’ job, they do nothing, letting the building fall further out of date and less attractive to potential tenants.
12. Taking responsibility and engaging with the experts will likely set building managers’ minds at ease. **Outsourcing the complications to neutral hosts who are domain specialists i.e. The Infrastructure Providers**, makes life easier, and they will often find out the solutions aren’t as complex as they might have first thought.