

Government of Punjab
Department of Industries & Commerce
(Infra Section)

To

✓ Secretary to Government of India,
Telecom Regulatory Authority of India (TRAI),
New Delhi.

Memo No. Infra/Consultation Paper/22/ 1810-A.

Dated: 25.04.2022

Subject:- Comments on Consultation Paper issued on use of Street Furniture for Small Cells and Aerial Fiber deployment by TRAI.

Reference is invited towards your DO No. C-17/(1)/2022-BBPA, dated 31.03.2022 on the subject cited above.

2. In this connection, it is submitted that comments/question wise response on Consultation Paper issued on use of Street Furniture for Small Cells and Aerial Fiber deployment by TRAI is attached herewith for necessary action at your end.



(Sibin C) IAS

Secretary-cum-Director Industries & Commerce

Endst. No. Infra/Consultation Paper/22/

Dated:

Copy of the above is forwarded to OSD to Chief Secretary Punjab for in reference to DO No. C-17/(1)/2022-BBPA, dated 31.03.2022 received from Secretary to Government of India, Telecom Regulatory Authority of India (TRAI), New Delhi.



(Sibin C) IAS

Secretary-cum-Director Industries & Commerce

Comments on Consultation Paper issued on Use of Street Furniture for Small Cells and Aerial Fibre Deployment by TRAI

Question wise response to TRAI Consultation paper is as follows:-

SNo	Question	State Government Response
1.	Is there a requirement for any modification in existing RoW Rules as notified by DoT to accommodate small cell deployment on street furniture? If yes, please provide the changes required	In the proposed State policy on usage of Street Furniture, simple rules for a faster and streamlined approval process to ensure quick and timely deployment is being proposed. To facilitate the process, batch processing for group of small cells is being proposed, sharing of Small cells sites has also been made an integral part of the proposed State policy. Electricity connections of upto 4KW would be made available at Street Furniture sites wherever required for powering small cells and OFC equipments.
2.	Have the amendments issued in 2021 to RoW rules 2016 been able to take care of the needs of aerial fibre deployment? If not, what further amendments can be suggested? Please provide exact text with justification.	Amendments made in 2021 to Indian Telegraph Right of Way Rules, 2016 are in order. However, the sharing of aerial fibre as much as possible to the tower should be mandated as this will avoid duplication of infrastructure, as well as result in CAPEX reduction.
3.	What are the suggestions of stakeholders for aligning RoW policies issued by various other Central Government Bodies with existing DoT RoW policy?	The issue relates to Government of India. As far as State of Punjab is concerned, there is no administrative fee prescribed for laying of optical fibre cable by BBNL.
4	<p>Q4. Whether it should be mandated that certain public infrastructure (municipality buildings, post offices, bus, and railway stations, etc.) be earmarked to have dedicated spaces that allow service providers to deploy macro/small cells? If yes, what are the possibilities and under what legal framework this can be done? What should be the terms and conditions of use of such infrastructure? Please provide detailed inputs with justifications.</p> <p>Q5. Can some of the street furniture like traffic lights, metro pillars etc be earmarked for mandatory sharing between controlling administrative authority and Telecom Service/Infrastructure providers for deployment of small cells and aerial fiber? Does existing legal framework support such mandating? What should be the terms and conditions of such sharing? Please provide details.</p> <p>Q6. How can infrastructure mutualization and infrastructure collaboration be ensured to avoid exclusive rights of way? What legal provisions can support mandating these? Provide full details.</p>	In the proposed State Policy for Small Cells, dedicated space is being made available on mutually agreed commercial basis. A uniform procedure is being laid down with a clear provision for mandatory sharing of Street furniture.

5.	<p>Q.7 Should there be permission exemption for deploying certain categories of small cells at all places or all categories of small cells at certain places (Like apartments etc.)? What legal framework will support such exemptions?</p> <p>Q8. What should be the criterion/ conditions (like power, height etc.) and administrative procedure for implementing such exemptions? Please provide exact text with detailed justifications</p>	<p>Punjab State Telecom Guidelines 2020 provides for in-building solution (IBS) as per clause no. 1.7. IBS works in building which has poor connectivity in terms of weak signal strength inside the office, shopping mall, hospitals, multi storey buildings etc. For installing in-building solutions, no clearance is required and only permission of the administrative authority of the building is required.</p> <p>As far as small cells is concerned, no additional permission should be required where other telecom companies have already taken permission for putting up small cells.</p> <p>The only criteria that should be applicable for according permissions to put up small cells should be structural stability and the number of small cells should be allowed in consonance with that.</p>
6.	<p>Q.9 For Small Cells that do not fall under the exemption category, should there be a simplified administrative approval process (like bulk approvals etc.) for deployment? If yes, what should be the suggested process? If not, what should be the alternative approach?</p>	<p>In the proposed Punjab policy on Small Cells, bulk approvals of Small Cells have been included and nominal fee of Rs. 250 per year per site has been proposed.</p>
7.	<p>Q.10 What power-related problems are envisaged in deploying small cells on street furniture? Please provide full details.</p> <p>Q11. What viable solutions are suggested to address these problems? Please provide full details.</p>	<p>It is proposed to provide uninterrupted power supply for functioning of Small Cells. Because of this, Electric poles, bus shelter, bill boards, Traffic lights are best suited to host Small Cells because electric connections can be organized at short notice. Some sort of power back up will also be required to made part of the equipment for Small Cells.</p>
8.	<p>Q.12. Is there a need for standardizing the equipment or installation practices for next-generation small cell deployment on street furniture? If yes, what are the suggested standards and what should be the institutional mechanisms for defining, and complying to them?</p>	<p>As a need for data is growing exponentially, an immediate need for this standardisation may not be prudent. Standardisation can be done for structures, poles and other street furniture that will be developed in the future.</p>
9.	<p>Q.13 Is there a need for a specific mechanism for collaboration among local bodies /agencies for deployment of small cells and aerial fibre using street furniture? If yes, what mechanisms should be put in place for collaboration among various local bodies/agencies involved in the process of permissions with TSPs/IP1s and to deal with other aspects of Small Cell deployment?</p> <p>Q14. Kindly suggest an enabling Framework that shall include suggestions about the role of various authorities, rules of coordination among them, compliance rules and responsibilities, approval process, levies of fees/penalties, access rules etc.</p>	<p>State Broadband Committee and its Sub Committee (Operational Committee) will be able to bring about necessary co-ordination wherever there is any problem. Appointment of Nodal Officers by every concerned department at State level can add to better co-ordination. In the proposed State Policy for Small Cells for site locations where electricity authorities/metro rail corporations or other government organizations are permitting installation of Small Cells, further permissions from Municipal Corporations and Local Bodies need not be mandatory.</p>

10.	<p>Q.15 How can sharing street furniture for small cell deployment be mandated or incentivized? What operational, regulatory, and licensing related issues are expected to be involved in sharing of small cells through various techniques in the Indian context and what are the suggested measures to deal with the same?</p>	<ul style="list-style-type: none"> • Usage of Public infrastructure like electricity boards for aerial OFC <ul style="list-style-type: none"> - Cost Effective - Ease to manage • Street furniture providing power back up and coverage • Sharing of Telecom Infrastructure <ul style="list-style-type: none"> - Expansion of Network coverage - Reduce capital expenditure and operating expenditure - Minimize duplication of Infrastructure • Nominal fees to be charged for the site by the Government.
11	<p>Q.16 Whether there should be any specific regulatory and legal framework to enable Small Cell and Aerial Cable deployment on</p> <ul style="list-style-type: none"> • Bus Shelters • Billboards • Electric/Smart Poles • Traffic lights • Any other street furniture <p>Q17. What should be the commercial arrangements between the TSP's/Infrastructure Providers and street furniture owners for the same?</p>	<p>The street furniture should be available to all in a non-discriminatory manner. There should be uniformity in grant of access to public spaces/structures. Charges, if any, are to be only levied in case of any defacement of such structures and limited to not more than the restoration charges.</p> <p>At this stage, there is no need for a legal framework.</p> <p>It is reiterated that in the proposed Punjab policy on Small cells, a nominal fee of Rs. 250/- per site per year has been proposed to be charged by the Appropriate Authority.</p>