महानगर टेलीफोन निगम लि॰
(भारत सरकार का उद्यम)
Mahanagar Telephone Nigam Ltd.
(A Government of India Enterprise)
CIN: L32101DL1986GOI023501

स्वच्छ भारत
एक कदम स्वच्छता की ओर

MTNL/RA/TRAI-CP-15/2017
Dated 04.12.2017

To,

The Advisor (NSL)
TRAI, New Delhi

Sub. : TRAI Consultation dated 09.10.2017 on "Next Generation Public Protection and Disaster Relief (PPDR) communication networks".

TRAI issued a consultation paper on 09.10.2017 on the aforesaid subject and asked the various stakeholders to comment on the issues involved in the consultation paper. In this reference the following comments are submitted for consideration:

Q1. Do you consider the existing fragmented model of PPDR communication network in the country adequate to meet the present day challenges? If not, what are the deficiencies in the existing model of PPDR?

MTNL Comment: No, As the PPDR communication networks in India use narrowband radios. The narrowband nature of these radios limits them to 2-way voice communications with no inherent support for high-bandwidth transmission requirements.

Q2. In the various models described in para 2.11-2.15, in your opinion which of the model (dedicated, commercial, hybrid) will be more suitable for Indian conditions? or Is there any other alternate model which would be more suitable for Indian telecom environment? Please provide rationale for the suggested model.

MTNL Comment: Hybrid model will be more suitable for Indian conditions.

Q3. Should PSUs be earmarked for providing nationwide broadband PPDR communication network? Please justify your answer.

MTNL Comment: Yes, PSUs may be earmarked for providing nationwide broadband PPDR communication network. Since these PSUs have vast infrastructure and presence across the length and breadth of the nation which could help in minimize time to market and reduce overall deployment, operation and maintenance cost by leveraging the existing infrastructure and assets. The PSU's being Governments agencies, should be first priority for implementation of Government projects of National importance. Both, TSP and various PPDR agencies may enter into stringent SLAs for operation and maintenance of such networks.

Q4. Will it be technically feasible and beneficial to permit PPDR trunking service roaming on public telecom networks? If yes, what challenges do you foresee in implementation of such an arrangement? Please justify your answer.

MTNL Comment: Yes, as present LTE technology is able to provide critical enterprise communication services such as broadband trunking, video surveillance, data acquisition, broadband data access, emergency communications, and other broadband services on a single network. Thus technological innovations has enabled and made it feasible for PPDR trunking service roaming on public network.

Q5. Can frequency bands be identified exclusively for public protection and disaster relief? What are the candidate bands for PPDR operations in India?

MTNL Comment: Yes, the frequency bands should be clearly identifiedkeeping in mind the global ecosystem development for PPDR communication in those bands.

The candidate bands for PDPR operations are 406.1-430 MHz, 440-470 MHz, 806-824/851-869 MHz, 4940-4990 MHz and 5850-5925 MHz,lowest frequency around the 700 MHz/800 MHz band etc.

Q6. If wideband/broadband PPDR is to be implemented in India, what quantum of spectrum will be needed for such solution for PPDR?

MTNL Comment: The candidate bands for wideband/broadband PDPR operations are lowest common commercial frequency, around the 700 MHz/800 MHz band, 450 MHz (existing 3GPP Band 31) and potential new 3GPP Band 68.

Q7. What is the cost and benefits tradeoff envisaged for public protection and disaster relief viz-a-viz commercial value of spectrum?

MTNL Comment: If the Dedicated network is deployed exclusively for PPDR, will require huge capital investment& periodic investment in future for any technological advancement.

Also the Socio-economic benefits arises from the ability to access a wide variety of information, including informational databases, access to instant messaging, high-quality images and video, mapping and location services, remote control of robots, and other applications.

Q8. Do you suggest any other workable option that can be adopted?

MTNL Comment: No comment

Q9. Please give your comments on any related matter not covered in this consultation paper.

MTNL Comment: No comment

Darshan 04/12/17

(Darshan Lal)

DE(RA&C),CO