

NCRTC/DS&O/DoT/

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To,
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Sub: Comments on TRAI Consultation Paper on Assignment of Additional Spectrum to Indian Railways for its Safety and Security Applications.

Ref: Consultation Paper No. 01/2024.

With regards to TRAI Consultation Paper on Assignment of Additional Spectrum to Indian Railways for its Safety and Security Applications, please find attached NCRTC comments in Annexure 1.

Yours Sincerely

AGM/S&T/TC

Encl:

1. NCRTC comments at Annexure 1.

ANNEXURE 1

NCRTC Comments On

TRAI Consultation Paper on Assignment of Additional Spectrum to Indian Railways for its Safety and Security Applications

Q1. Whether an additional 5 MHz (paired) spectrum in the 700 MHz band should be assigned to Indian Railways (IR) in order to meet its requirement for safety and security applications? Kindly provide a detailed response with justification.

Response: Indian Railway may be assigned the requested additional spectrum to meet its requirement for safety and security applications.

Q2. In case your response to Q1 is negative, -

(a) In what manner, the requirement of the IR for safety and security applications may be fulfilled?

(i) Specifically, whether it would be appropriate to devise a framework under which the 10 MHz (paired) spectrum [5 MHz (paired) assigned to IR, and 5 MHz (paired) reserved for NCRTC and other RRTS/ Metro rail network] in the 700 MHz band may be used by all types of rail networks on shared basis, subject to the outcome of the field trial recommended by the Authority in its recommendations on ‘Spectrum Requirements of National Capital Region Transport Corporation (NCRTC) for Train Control System for RRTS Corridors’ dated 28.12.2022? If yes, please suggest the key features which should be included in such a framework?

(ii) Any other suggestion may be provided with detailed justification.

(b) In case your response to Q(2)(a)(i) is affirmative, whether a frequency spectrum of 10 MHz (paired) in the 700 MHz band would be sufficient to meet the requirement of different rail networks in India particularly in the overlapping zones? Kindly provide a detailed response with justification.

Response (a): The sharing of spectrum between NCRTC and Railways is a settled issue which does not require reconsideration. On this topic various meetings took place at administrative and technical level of relevant stakeholders. Finally, a meeting was held between the highest level of Indian Railways, NCRTC and DoT on 11.12.2021 in which Indian Railway categorically refused sharing of spectrum due to safety reasons. Therefore, a considered view, was reached after long deliberation with Indian Railways and DoT, wherein Indian Railway insisted that sharing of spectrum is not possible for passenger safety reasons.

In view of this, separate 5 MHz spectrum has been allotted to NCRTC and is approved by cabinet.

(b): No comments

Q3. In case it is decided to assign an additional 5 MHz (paired) spectrum in the 700 MHz band to IR, whether there is a need for harmonization of spectrum in the 700 MHz band to make the spectrum assigned to IR, and NCRTC and other RRTS/ Metro Rail Networks contiguous? Kindly provide a detailed response with justification.

Response: Indian Railways may be given harmonized spectrum. The spectrum for NCRTC and RRTS/Metro railway networks may or may not be contiguous spectrum.

Q4. Should a uniform spectrum charging methodology be adopted for Indian Railways as well as for NCRTC and other RRTS/ Metro rail networks? If yes, which of the following spectrum charging methodology be adopted in this regard:

(i) Spectrum charging methodology based on Auction Determined price (ADP) as recommended in the TRAI's recommendations on 'Spectrum requirements of National Capital Region Transport Corporation (NCRTC) for train control system for RRTS corridors' dated 28.12.2022.

(ii) Spectrum charges as levied for Indian Railways as per DoT's Order No. P-11014/34/2009-PP (II) and P- 11014/34/2009- PP(IV) dated 22nd March 2012 (revised vide DoT's order dated 11.12.2023).

(iii) Apart from the methodologies highlighted in (i) and (ii) above, any other uniform spectrum charging methodology that may be adopted in this regard?

Details with justification may kindly be provided.

Response: The spectrum charging methodology cannot be same for Indian Railways and other RRTS/Metro Rails for the following reasons:

1. Indian Railways is supported through government budget for significant part of its capital investment while Metros have to repay their debt.
2. Passenger journeys are supported by cross-subsidy in Indian Railways, but this is not the case with NCRTC.
3. In case of Indian Railways, Railway Stations come first and cities develop around the stations later. IR for this reason, owns large land banks and doesn't have to pay for acquiring land whereas, NCRTC has to pay three to four times of market rate for acquiring land.

Considering this, NCRTC should be given the spectrum free of cost. If that is not possible then it should be at least one tenth of the price given by Indian Railways.

Q5. If answer to Q4 above is no, whether the existing charging methodology as per DoT's Order No. P-11014/34/2009-PP (II) and P- 11014/34/2009-PP(IV) dated 22nd March 2012 (revised vide DoT's Order dated 11.12.2023) be continued for Indian Railways or some other spectrum charging methodology

may be adopted specifically for Indian Railways? Please provide detailed response with justification.

Response: Same as answer to question number four.

Q6. If a spectrum charging methodology similar to NCRTC and other RRTS/Metro rail networks, is adopted for Indian Railways, what should be the payment terms and associated conditions relating to:

- i. Upfront payment**
 - ii. Moratorium period**
 - iii. Total number of instalments to recover deferred payments**
 - iv. Rate of interest in respect of deferred payment and prepayment**
- Please support your answer with detailed justification.**

Response: No comments.

Q7. Any other suggestions relevant to the subject may kindly be made with detailed justification.

Response: No comments.



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