

**COUNTER COMMENTS TO REMARKS MADE BY OTHER STAKEHOLDERS IN RESPONSE TO TRAI CONSULTATION PAPER ON "ISSUES RELATED TO TELECOMMUNICATION INFRASTRUCTURE POLICY"**

In response to TRAI's Consultation Paper on the issues relating to Telecommunication Infrastructure Policy, we have gone through the comments made by various stakeholders. We would like to counter comment on some issues highlighted and suggestions made by some industry/industry associations.

**1) Fuel subsidy :**

The suggestion that Fuel (diesel) Subsidy should be provided for rural applications will only encourage the use of diesel engine alternators for running BTS. This will :

- a) *Encourage pilferage for illegal means:* The subsidized price of fuel will encourage theft of diesel to sell in the open market at a higher price. The actual price advantage will not be available to the user.
- b) *Encourage the use of diesel engine freely causing carbon emission:* It is globally identified that pre-dominant use of diesel generators as alternate source of power is a big source of carbon emission apart from the air & noise pollution. It is estimated that all the towers use about 2 billion litres of diesel and produce about 60 tonnes of CO<sub>2</sub> per BTS every year.
- c) *Increase outflow of foreign exchange:* India is largely dependent on the import of oil. The subsidy on oil will only increase the use of diesel as a fuel resulting in Forex outflow. It should be our policy to discourage the use of diesel for such applications.
- d) *Discourage innovations in the field of alternate energy development:* The availability of fuel at a subsidized rate will work against the need for innovations in the development and use of alternate energy.

**Therefore we urge that TRAI should not consider such recommendations / suggestions.**

**2) Reduction in the customs duties for the imported equipment:**

The suggestion of reduction in custom duty on all infrastructure items will only encourage imports of the items. This will de-motivate and discourage the indigenous efforts in the country to develop and manufacture telecom infrastructure equipment. Custom duty should be reduced on components required for indigenous manufacturing rather than assembled items. This would encourage indigenous development and reduce the foreign exchange outflow.

**3) Misplaced apprehensions on health hazards of Electromagnetic radiation from Mobile Antennae-BTS**

In this regards we will like to state that DOT has already published Inter Ministerial Committee report on Electromagnetic Radiation from Base stations and Handsets. Among other recommendations, it also proposes lowering the RF exposure limits from Mobile Base Stations to 1/10<sup>th</sup> of the existing levels and also proposed the adoption of SAR value mobile handset to 1.6 Watt/Kg in accordance to FCC.