



10th June 2021

Shri Sunil Kumar Singhal,
Advisor (Broadband & Policy Analysis)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg, (Old Minto Road)
New Delhi – 110002

Subject: Supplementary Consultation Paper on “Roadmap to Promote Broadband Connectivity and Enhanced Broadband Speed”.

Dear Sir,

This is in reference to your Supplementary Consultation Paper dated 19th May 2021 on “Roadmap to Promote Broadband Connectivity and Enhanced Broadband Speed”.

As desired, we hereby enclose our response to the questions raised in your above-mentioned Consultation Paper. We hope our response will be given due consideration.

We shall be obliged to address any further queries from your good office in this regard.

Thanking you and assuring you of our best attention always.

Thanking you,

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Satya Yadav', written over a light blue horizontal line.

Satya Yadav
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Encl: As above



*TRAI Supplementary Consultation Paper on
"Roadmap to Promote Broadband Connectivity and Enhanced Broadband Speed"
Comments by Tata Teleservices Limited & Tata Teleservices (Maharashtra) Limited*

At the outset, Tata Teleservices Limited and Tata Teleservices (Maharashtra) Limited [together called "TTL"] once again express our sincere gratitude to Telecom Regulatory Authority of India (TRAI) for releasing the Supplementary Consultation Paper on "Roadmap to Promote Broadband Connectivity and Enhanced Broadband Speed" and calling for stakeholders' comments.

Our submission to the question-wise response is as follows:

Q.1: What should be the approach for incentivizing the proliferation of fixed-line broadband networks? Should it be indirect incentives in the form of exemption of license fee on revenues earned from fixed-line broadband services, or direct incentives based on an indisputable metric?

TTL Response: The importance of wireline connectivity is not only providing and delivering wireline broadband, but also in providing the necessary backbone and capacities for Wireless Broadband under 4G and 5G technologies, there is a need to review and recast the incentivizing measures for wireline service. However, this depends completely on the TSP on the locations which the Govt. wants TSP to focus and it must be a profitable business proposition on the investment done.

Q. 2: If indirect incentives in the form of exemption of license fee on revenues earned from fixed-line broadband services are to be considered then should this license fee exemption be limited to broadband revenue alone or it should be on complete revenue earned from services delivered through fixed-line networks?

TTL Response: In rural areas- with the adoption of wireless mobile device and free data offering - penetration for wireline broadband is less- various factors come into play when serving wired line data service specific to cities/ rural areas -which has power outage/ ROW issue due to no proper roads/ infra, Manpower or technical skill set to manage the deployed infra. Inadequate supply of power/ Load fluctuations etc- damaging the equipment is also major cause of outage and dependency from rural areas is on wireless devices.

Incentivize investments /completely remove the License Fee applicable on wireline revenue.

Further, the Telecom Industry has been constantly investing in building networks in the rural and unconnected areas on its own, and without much support from the USO Fund. Between 1999 and 2020, the number of:

- Unconnected villages reduced to **~27,000 i.e 4% of 6 Lakh Villages.**
- Rural teledensity % has reached **59.48** as on **28th Feb 2021.**
- Share of Rural subscribers as % of Total subscribers has reached **44.63% as on 28th Feb 2021.**

Direct- indirect benefits should be provided to TSPs in the form of incentives from USO Fund for roll-out of fixed line Broadband service.



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Q. 3: In case of converged wireless and fixed-line products or converged services delivered using the fixed-line networks, how to unambiguously arrive at the revenue on which license fee exemption could be claimed by the licensees?

TTL Response: Not Applicable (as TTL is not providing wireless services)

Q. 4: What should be the time period for license fee exemption? Whether this exemption may be gradually reduced or tapered off with each passing year?

TTL Response: Exemption of license fee should be basis the commitment done by TSP for roll out. This can be gradually tapered with benchmark, such as –

- Population index of the city/ town/villages
- Penetration of the overall wireline broadband service.
- Acceptability of the service offering
- Technology obsolescence time period as payback period
- End of Life declared by OEMs be considered for replacement incentive if sufficient revenues are not generated.
- Infrastructure of light/ road connectivity and town planning / DP plans which gives indication on the roadmap ahead for the villages.

Q. 5: Is there a likelihood of misuse by the licensees through misappropriation of revenues due to the proposed exemption of the License Fee on the revenues earned from fixed-line broadband services? If yes, then how to prevent such misuse? From the revenue assurance perspective, what could be the other areas of concern?

TTL Response: License fee exemption should be made purely on the merit of deployment done by the TSP basis the selection process/tender/bid for amplifying wired line connectivity with gram panchayat/rural municipal corporation/sarpanch.

Another method is linking the customer data / IP Pool allotted for the location / upload download volume report for the designated IP Pool in end of the month report. This report shall also include tariff plans with customer details.

Q. 6: How the system to ascertain revenue from fixed-line broadband services needs to be designed to ensure proper verification of operator’s revenue from this stream and secure an effective check on the assessment, collection, and proper allocation and accounting of revenue. Further, what measures are required to be put in place to ensure that revenue earned from the other services is not mixed up with revenues earned from fixed-line broadband services in order to claim higher amount of incentive/exemption.

TTL Response: All TSPs file Accounting Separation Report with TRAI annually which has licence wise and service wise segregation and details. This along with various Audits, some of which are backed by the Govt., which happen on regular basis, are sufficient to ensure that there is no misuse by the licensees.



Q. 7: Is there any indisputable metric possible to provide direct incentive for proliferation of fixed-line broadband networks? What would be that indisputable metric? How to ensure that such direct incentives will not be misused by the licensees?

TTL Response: As mentioned above - Direct incentive for proliferation of fixed-line broadband networks can be provided based to TSPs based on roll-out of fixed line broadband. Checks could be in the form of self-certificates submitted by TSPs post roll-out of service, RFS launch notification in local newspaper or CAF submitted by rural authority or by rural authority-if villages it can be Sarpanch/ Gram panchayat/ Rural development board. If incentive is based on customer activation, usage then the same should be verified in fixed time period (within a month or so) this helps to maintain minimal investment in data backups. Further, these incentives should be excluded from AGR computation as this is towards social development-oriented investment.

Q. 8: What are key issues and challenges in getting access to public places and street furniture for installation of small cells? Kindly provide the State/ City wise details.

TTL Response: Local authorities should adopt measures (e.g. generic permits, exemptions-no SACFA requirement, rule simplifications etc.) for simplifying planning approval processes for small cells.

1. RoW Rules, 2016 do not have provision for use of street furniture for deployment of telecom infrastructure. There is a need to incorporate the same for harmonising of procedures across different local authorities in entire country.
2. Complex local access and regulatory/ zoning requirements are imposed by some municipal Authorities and Smart city Authorities. This involves detailed processes and guidelines for reviewing and approving and to gain access to ROW for conduit or other above-ground physical infrastructure. There is need for the uniform guidelines across all the municipalities for accessing the street furniture sites.
3. There are also some environmental compliances also applicable for using the street furniture's, however this need to be kept in mind that street-furniture deployment is a collocation on an existing non-tower structure meeting all of the criteria being prescribed by the Government /Authorities.

In Maharashtra DIT was setup to provide permissions for ROW. However, Operators still have to apply to various Local Municipal Corporations separately for ROW permissions along with DIT clearance.

ROW Rules 2016 specifies a timeline of up to 60 days for granting the permission. In view of the dynamic telecom business environment and customer requirement it is requested that the time be reduced to 15 days from the date of application.

Some States like Telangana are imposing one time land leased charges along with ROW restoration charges which should be eliminated. ROW permissions are not given in Chennai



Metro City since April 2020. ROW permissions are not given timely in Pune, Delhi Metro City. In areas where the metro Railway is passing underground like in Chennai City, local authorities are not giving the ROW permissions. All States should follow a uniform policy as per the Central guidelines.

ROW restoration charges should be minimized so that Operators can further expand their reach and connectivity even to the remotest locations across the country.

To provide the speed at lower cost, ROW cost in the cities should be reduced. ROW permissions to be given after considering the joint requirement of all the Operators. Major States never follow the Smart City guidelines.

Major States post implementation of Smart City do not support the existing OSP work executed by the Operators in last 15 years. Support for restoration of services is also not granted in these cases. E.g. In spite of Track rent paid regularly to Chennai Corporation, permission is not granted to lay new cables nor Corporation allots the duct for cable laying.

Every State should have single body /authority for ROW permissions so that permission clearance and execution time is reduced to achieve the vision of Government’s Digital India.

A centralised ROW permission in each state or district with a fixed timeline for sanctioning of permission or deemed approval in case of delay beyond fixed timelines, standard charges on the type of the activity taken up would help.

Pre information on digging of any area can be given to all interested parties transparently so that any interested party can also plan to lay fiber in same duct as per commercial arrangements.

ROW cost for different type of street surface should be the same across all States.

State/Metro	Current ROW practice	Proposed ROW practice
Mumbai	1) DIT clearance required in addition to application to Corporation application 2) ROW cost is high	1) DIT application should be removed 2) ROW cost should be reduced
Telangana	1) One time land leased charges levied along with ROW restoration charges a. GHMC Area: Charging 10% of prevailing market land cost b. Outer ring road authority- 16% prevailing market land cost for 20 years period in Advance. 2) ROW Permission-UG not allowed in areas of CRMP (Comprehensive Road	1). One time land leased charges should be abolished. 2) ROW-UG should be allowed in areas of CRMP (Comprehensive Road maintenance programme)



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	maintenance Programme-All Hyderabad Major Roads approximately 700kms covered under CRMP)	
Chennai	1) ROW permission not granted in areas of underground Metro areas	1) ROW permission should be granted in areas of underground Metro areas
	2) ROW permission not granted in areas of SMART City project.	2) ROW permission should be granted in areas of SMART City project.
	3) ROW permission not granted in areas of white top ie., Concrete Road within City Corporation limit/Municipality.	3) ROW permission should be granted in areas of white top ie., Concrete Road within City Corporation limit/Municipality.
	4) ROW permission not granted in areas of Major Road crossing within City Corporation limit/SH/NHAI.	4) ROW permission should be granted in areas of Major Road crossing within City Corporation limit/SH/NHAI.
ROTN	1) ROW permission not granted in areas of Major Road crossing within City Corporation limit/SH/NHAI.	1) ROW permission should be granted in areas of Major Road crossing within City Corporation limit/SH/NHAI.
	2) ROW permission not granted in areas of white top ie., Concrete Road within City Corporation limit/Municipality.	2) ROW permission should be granted in areas of white top ie., Concrete Road within City Corporation limit/Municipality.
Kerala	1) ROW permission not granted in areas of underground Metro areas.	1) ROW permission should be granted in areas of underground Metro areas.
	2) ROW permission not granted in areas of SMART City project.	2) ROW permission should be granted in areas of SMART City project.
	3) ROW permission not granted in areas of white top ie., Concrete Road within City Corporation limit/Municipality.	3) ROW permission should be granted in areas of white top ie., Concrete Road within City Corporation limit/Municipality.
	4) ROW permission not granted in areas of Major Road crossing within City Corporation limit/SH/NHAI.	4) ROW permission should be granted in areas of Major Road crossing within City Corporation limit/SH/NHAI.
Odisha (Bhuvneshwar)	1) ROW permission not granted in areas of SMART City project.	1) ROW permission should be granted in areas of SMART City project.
	2) ROW permission not granted in areas of Major Road crossing within City Corporation limit/SH/NHAI.	2) ROW permission should be granted in areas of Major Road crossing within City Corporation limit/SH/NHAI.



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Bihar & Jharkhand (Jamshedpur, Ranchi, Patna)	1) ROW permission not granted in areas of SMART City project.	1) ROW permission should be granted in areas of SMART City project.
	2) ROW permission not granted in areas of Major Road crossing within City Corporation limit/SH/NHAI.	2) ROW permission should be granted in areas of Major Road crossing within City Corporation limit/SH/NHAI.
UP [Greater Noida Authority]	1) Yearly lease charges levied along with ROW restoration charges. 2) By default, Manhole charges are included by incorporating Chamber at every 100M.	1) Row permission should be granted on bank Guarantee basis. 2) Manhole charges should be levied on actual need of manhole.
GAIL India Limited	1) Time taken to grant permission is too high. 2) Very high charges towards supervision charges @ Rs. 2 Lac per crossing.	1) Permission time should not exceed 30 days. 2) Supervision charges per crossing should be nominal @ Rs. 10,000 per crossing.
Kolkata	1) ROW Permission granting timeline are high.	1)ROW Permission sanction to be limit to 30 days maximum.
Maharashtra	1) DIT clearance required in addition to application to Corporation application.	1) DIT application should be removed.
Karnataka	1) ROW permissions from GAIL, Bangalore Water Supply Department, BBMP take time. 2) New Concrete and Asphalt roads permissions take 2-3 years and 1-2 years respectively.	1) Permission time should not exceed 30 days. 2) Permission time should not exceed 30 days.

Q. 9: How to permit use of public places and street furniture for the effective rollout of 5G networks? Kindly suggest a uniform, simple, and efficient process which can be used by States/ Local-Bodies for granting access to public places and street furniture for installing small cells. Kindly justify your comments.

TTL Response: Granting access to public buildings and street “furniture,” such as bus stop shelters, lamp posts or traffic lights, owned by municipalities, at low or no cost removes a significant hurdle to site deployment. New street infrastructure that is manufactured and installed deployment-ready means operators can attach their equipment and connect to backhaul and energy networks.

There is need to create awareness among municipal bodies officials and to explain the opportunities and benefits of use of street furniture associated with wireless street furniture and seek support.



There is need to clearly discuss the charges and fees for access in relation to any published municipal schedule.

Q. 10: Which all type of channels of communication should be standardized to establish uniform, transparent, and customer friendly mechanisms for publicizing provisioning of service and registration of demand by Licensees?

TTL Response: Website and social media advertisements can be used for providing uniform and transparent information to customers. But local newspaper ad/regional language/local language communication via gram panchayat is also needed.

Q. 11: Whether proliferation of fixed-line broadband services can be better promoted by providing Direct Benefit Transfer (DBT) to subscribers of fixed-line broadband services? If no, elucidate the reasons.

TTL Response: Yes, it can be DBT to subscribers of fixed line broadband service.

&

Q. 12: If answer to Q11 is affirmative, then:

- i. **Should DBT scheme be made applicable to all or a particular segment of fixed-line broadband subscribers? Kindly justify your comments.**

TTL Response: If the Govt decision on enhancing broadband speed and increasing reach to connectivity- same should start from the govt. offices/ tax collection department/Gram panchayat/ Online classes /training to farmers via video calls from E- Nam (Online trading for national agriculture market)- other many divisions of govt.

- Paramparagat Krishi Vikas Yojana (PKVY): PKVY is being implemented by INM Division.
- Soil and Land Use Survey of India (SLUSI): Being implemented by RFS Division.
- National Rainfed Area Authority (NRAA): Being implemented by RFS Division.
- Mission Organic Value Chain Development in North Eastern Region (MOVCDNER): Being implemented by INM Division.
- National Centre of Organic Farming (NCOF): Being implemented by INM Division.
- Central Fertilizer Quality Control and Training Institute (CFQC&TI): implemented by INM Division.

This will certainly interest locals/ public from small towns to have wired line connectivity thereby increasing digital literacy of rural areas as well.

- ii. **If you recommend supporting a particular segment of fixed-line broadband subscribers, how to identify such segment of the subscribers?**

- iii. **How to administer this scheme?**



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iv. What should be the amount of DBT for each connection?

It completely depends on passing the benefit basis any TSP cost of deployment & how quick approvals are in place.

v. What should be the period of offer within which individuals need to register their demand with the service providers?

This should be done at Gram panchayat/ Local municipal wards- so that it gives benefit.

vi. What should be the maximum duration of subsidy for each eligible fixed-line broadband connection?

A scheme like the PAHAL scheme for giving benefit of DBT, to LPG consumers can be adopted.

Q. 13: Any other related issue.

NA