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Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
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Jawaharlal Nehru Marg (Old Minto Road)
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**GSMA RESPONSE to TRAI's Consultation Paper on
Allocation of Spectrum Resources for Residential and Enterprise Intra-telecommunication
Requirements/ cordless telecommunications system (CTS)**

Dear Sir,

The GSMA thanks the Telecom Regulatory Authority of India (TRAI) for the opportunity to provide comments on its consultation on the above issue.

Mobile technologies are the primary means of communication for much of the Asia Pacific (especially India) and mobile broadband is expected to be the critical service that will finally bridge the digital divide and connect the unconnected across the region. Mobile connectivity has had an incredible effect on society and economy of India over the last decade. From a relatively low fixed-line base, India today has over 894 million mobile connections. However, for ubiquitous and seamless mobile communications and broadband to exist, for governments to tap into the economic value add of the industry, and for people to be able to benefit from the full range of voice and data services, sufficient spectrum must be allocated to the mobile industry. The amount of spectrum allocated greatly affects mobile operators' ability to provide adequate coverage and capacity in a cost effective manner and their ability to meet increasing demands for high speed mobile data.

GSMA believes that international harmonisation of frequency bands is instrumental in achieving cost-effective roll-out of networks. There are also significant economies of scale in the production of radio equipment and handsets. It also reduces harmful cross-border interference and helps facilitate international roaming. Harmonisation of frequency bands is especially important for emerging economies like India, where affordability is the greatest barrier for access as it can drive down rollout costs and consumer pricing. Infact, spectrum harmonisation combined with universally



adopted international standards- is what drove the remarkable growth and uptake of mobile technology.

The TRAI proposal considers allocating the 1880-1900 MHz and the 1910-1920 MHz bands for DECT/CTS. These are adjacent to two primary mobile bands mentioned below. The internationally harmonised Mobile 1800 MHz band is 1710-1785 MHz paired with 1805-1880 MHz. The internationally harmonised Mobile 2100 MHz band is 1920-1980 MHz paired with 2110-2170 MHz.

GSMA strongly recommend using an internationally harmonised approach when defining the spectrum usage right in the bands being considered by the Authority. Clearly defined rights/regulation to use DECT/CTS spectrum is important to prevent harmful interference into adjacent core mobile bands mentioned above. This will provide certainty to the mobile industry enabling investment in the rollout of networks utilising the spectrum in the core mobile bands. Initially, these can be based on maximum interference levels that would not impair the quality of existing spectrum use, particularly in terms of power limits at geographic and frequency boundaries.

This technical regulation may also consist of penalties in the cases where they are creating interference to the mobile services. Therefore, strict rules are necessary to prevent the services being proposed by TRAI from interfering with the core mobile bands.

The technical regulations should also define general authorisation for using the frequencies for DECT as 'second priority'. This would mean that the DECT/CTS users must accept interference from mobile in the adjacent band and the user of frequencies for DECT cannot create harmful interference for the holder of the mobile licence in the adjacent band.

In view of the above, GSMA would request that the TRAI ensures that the use of bands for DECT/CTS must be regulated in a way that will not affect the use of internationally harmonised adjacent mobile bands.

ABOUT THE GSMA

Founded in 1987, the GSMA is the global trade association of the mobile industry, representing more than 800 mobile operators across 219 countries and territories of the world. In addition, more than 180 manufacturers and suppliers support the Association's initiatives as associate members.



The primary goals of the GSMA are to ensure that mobile devices and wireless services work globally and are easily accessible, enhancing their value to individual customers and national economies, while creating new business opportunities for operators and their suppliers. The Association's members represent more than 5 billion mobile connections.

Since the GSMA was founded 24 years ago, GSM technology has progressed through a series of technology evolutions, firstly through GPRS and EDGE, and subsequently through WCDMA, HSPA, HSPA+ and onto LTE. These revolutionary technology advances are now being combined to provide a full range of voice and mobile internet services.

The GSM ecosystem currently provides mobile internet services to nearly one Billion connections using High Speed Packet Access (HSPA)¹ technology. LTE was launched commercially in 2009 and is being rolled out in the US, Asia and Europe and the Middle East.

A handwritten signature in black ink, appearing to read "Chris Perera", is positioned above a horizontal line.

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¹ HSPA refers to High Speed Packet Access and encompasses HSDPA, HSUPA and HSPA+.